R-Engineering EOOD	
XXX-X-XXXX-XX-XXXX-000-00	

Title:

Environmental and Social Management Plan for St. George Solar PV Project

Topic:

Defines arrangements in place for the management of environmental and social aspects during St. George Solar PV Project Execution

Target Group:

R-Engineering EOOD, EPC, Owner's Engineer

	Name	Position	Signature	Date
Created by:			---	---
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Revision Details					
Rev. No.	**Revision Status**	**Revised chapter/ page**	**Revision's reason**	**Revision's promoter**	**Revision's date**
A	1.0	First draft	First draft for Lender review	DJ	05 February 2024
A	2.0	Final draft	Final draft for Lender review	DJ	08 April 2024
A	3.0	Final for start of construction	Update to include lender comments and EPC comments and construction noise mitigation	DJ	31 July 2024

Contents

ABBREVIATIONS

ATS	*Action Tracking System*
CMP	*Contractor Management Plan (generic term for management plans, method statements, work procedures implemented by contractors)*
EPC	*Engineering, Procurement, and Construction*
E&S	*Environmental and Social*
ESHS	*Environmental, Social, Health and Safety*
ESIA	*Environmental and Social Impact Assessment*
ESMP	*Environmental and Social Management Plan*
ESMR	*ES Monitoring report*
HR	*Human resources*
HUB	*Hub substation*
IFC	*International Finance Corporation*
KPIs	*Key Performance Indicators*
L-S	*Ludogorie – Srebarna*
NCR	*Non-conformance reporting*
OHTL	*Overhead Transmission Line*
PS	*Performance Standard*
PV	*Photovoltaic*
SPV	*Special Project Vehicle*
SUS	*Step up Substation*

1.0 INTRODUCTION

1.1 PURPOSE

R-Engineering EOOD. (the Project Company) is a special project vehicle (SPV) established to build, own, and operate the St. George Solar PV Project (the Project).

An Environmental and Social Impact Assessment (ESIA) Package has been prepared for the Project. A key part of the Package is the Project Environmental and Social Management Plan (ESMP) as described in this document.

The purpose of this ESMP is to:

- Provide an overview of the environmental and social policies, regulations and standards applicable to the Project to all project staff, including contractors;
- Document and direct the Project Owner's personnel and guide the Engineering, Procurement and Construction (EPC) Contractor for the PV Project on how Project Environmental and Social (ESHS) risks are managed during the construction stage of the Project to conform with applicable policies, regulations and standards and ensure the Project commitments are attained. This includes (i) establishing measures to be applied, (ii) communicating requirements to project staff, including contractors, and (iii) oversite of requirements implementation, as detailed further in this ESMP;
- Document and direct construction contractor for overhead line works (OHTL) on how Project ESHS risks are managed during the construction stage of the Project to conform with applicable policies, regulations and standards and ensure the Project commitments are attained. This includes (i) establishing measures to be applied, (ii) communicating requirements to project staff, including contractors, and (iii) oversite of requirements implementation, as detailed further in this ESMP[1];
- Clarify ESHS compliance assurance roles and responsibilities during the construction stage of the Project;
- Ensure that adequate processes are in place to appropriately monitor construction activities against Project ESHS policies, regulations and standards;
- Ensure reporting systems are developed and implemented to communicate ESHS compliance performance to Project Owner's leadership and further to all project staff, including contractors; and
- Facilitate continual improvement and ESHS compliance assurance.

This ESMP details the ESHS management processes associated with the construction and commissioning stages of the Project. This ESMP and associated management plans will be revised to accommodate any new mitigation required and reflect lessons learned from the ESHS monitoring.

The ESMP will be subsequently updated and revised as appropriate for the operational stage of the Project to reflect the different ESHS risks at that stage and any lessons-learned to date – referred to as the Operation-ESMP. The Operation-ESMP, along with supporting operational management plans, will be drafted during the end of the construction stage and disclosed not later than two months before the start of St. George Solar PV Project commercial operations.

This ESMP provides an overview of the processes to identify, avoid, mitigate, and manage Project ESHS risks during construction. The ESMP is the central document of the Project ESHS management system and is supported by a series of subordinated ESHS management plans and procedures implemented at Company and Contractor levels:

- Project Owner Level ESHS Management Plans – see Figure 3 in section 2 for an overview of the various management plans. These plans lay out the processes implemented by R-Engineering

1 The final structure of the ESMP between the solar PV EPC Contactor and the overhead line contractor will be defined in the EPC Contractor plans based on the specific contracting structure.

EOOD to ensure Project policies, standards and commitments are attained during the construction stage of the Project and guide the EPC Contractor on the requirements and management plans to be implemented for the Project as part of their ESHS management system.

- Contractor Level ESHS Management Plans referred to in this ESMP as Contractor Management Plans (CMP) – see section 2.5 for an overview of the ESHS management plans to be put in place by the EPC Contractor to ensure implementation of the Project policies, standards and commitments during own Project construction activities.

Box 1.1 Project ESHS risks management approach

The management of the Project's ESHS risks will follow a "cascade" approach, reflecting good international practice:

- The guiding plans and policies are outlined in this ESMP and related Project Owner – Level Management Plans;
- EPC must - on this basis - develop their own EPC-ESHS Plan (to be approved by R-Engineering EOOD) and Contractor Level Management Plans and method statements;
- EPC must implement and enforce the EPC-ESHS Plan measures in their own activities and those of any of their subcontractors and other service providers;
- EPC undertakes periodic monitoring of EPC-ESHS Plan implementation (and reports to the Project Owner);
- Project Owner conducts its own overall monitoring of the EPC performance (and reports to Lenders);
- Lenders and external advisors conduct independent Project ESHS audits.

Updates/revisions to the ESMP and the EPC-ESHS Plan will be implemented as appropriate to reflect the ongoing findings of the monitoring and audits performed, as well as the corresponding staff training. This approach provides for a robust system with continual improvement of Project ESHS risk management.

1.2 THE ST. GEORGE SOLAR PV PROJECT

The developer is Rezolv Energy (the "Company"), an independent clean energy power producer funded by Actis Eastern Europe Energy S.a.r.l. (https://www.act.is/). Rezolv Energy has set up a special project vehicle (SPV) as the Project Company named R-Engineering EOOD as the entity responsible for the development of the St. George PV Project (Phase I and Phase II) (hereafter described as the "PV Project"). In addition to the PV Project, two 110 kV overhead lines (OHTL) will be constructed by the Project to evacuate power to the national grid ("OHTL Project"); together, the PV Project and the OHTL Project are considered the "Project".

For development purposes, the PV Project has been split into two "phases" or "PV power plants" to be built over relevant parts of the Project Site:

(i) Phase 1 - PV power plant with a capacity of 99,5 MWAC - "St. George East"

(ii) Phase 2 - PV power plant with a capacity of 99,5 MWAC - "St. George West"

The combined phases will have an overall installed capacity of approximately 229MWp.

The PV Project is located in northeast Bulgaria, on the land of the village of Polkovnik Lambrinovo, 5 km south of Silistra in the Silistra District. The Project is located on the site of a former airport, including a 2.5 km runway, a passenger terminal, adjacent infrastructure, and a former military airfield. The land was used by Silistra Airport, which was closed in 2000. The site is located on flat terrain with very minor undulation along the border. The site has a good tarmac road and is connected to Silistra town (approximately 12 km distant) via Route 218 and Route 21. The nearest major international airport and port is in the City of Varna,

which is situated approximately 140km from the project via Route 29, Route 71, and Route 207. The majority of the land around the site is agricultural. The PV Project coordinates are as follows:

- Latitude: 44.054837 o
- Longitude: 27,183113o
- Altitude: 122 m.a.s.l

The PV Project consists of the following components which are described in more detail in the ESIA.

- PV Plant Phase I on land plots of 151,2765 ha
- PV Plant Phase II on land plots of 104,51 ha
- Step-up Substation (SUS) - one substation with two step-up transformers
- Hub substation - located near the village of Smilets (HUB)
- Low Voltage (LV) cables and LV/MV power stations and transformers.

The OHTL Project includes:

- 110 kV double circuit OHTL “Pelikan” connecting to existing 110 kV OHTL “Silistra to Tutrakan” via “loop in loop out” “LILO” connection.
- 110 kV double circuit OHTL “Dorostol” connecting to existing 110 kV OHTL “Silistra to Dorostol” via “LILO connection.

A Project location map is provided in Figure 1 overleaf.

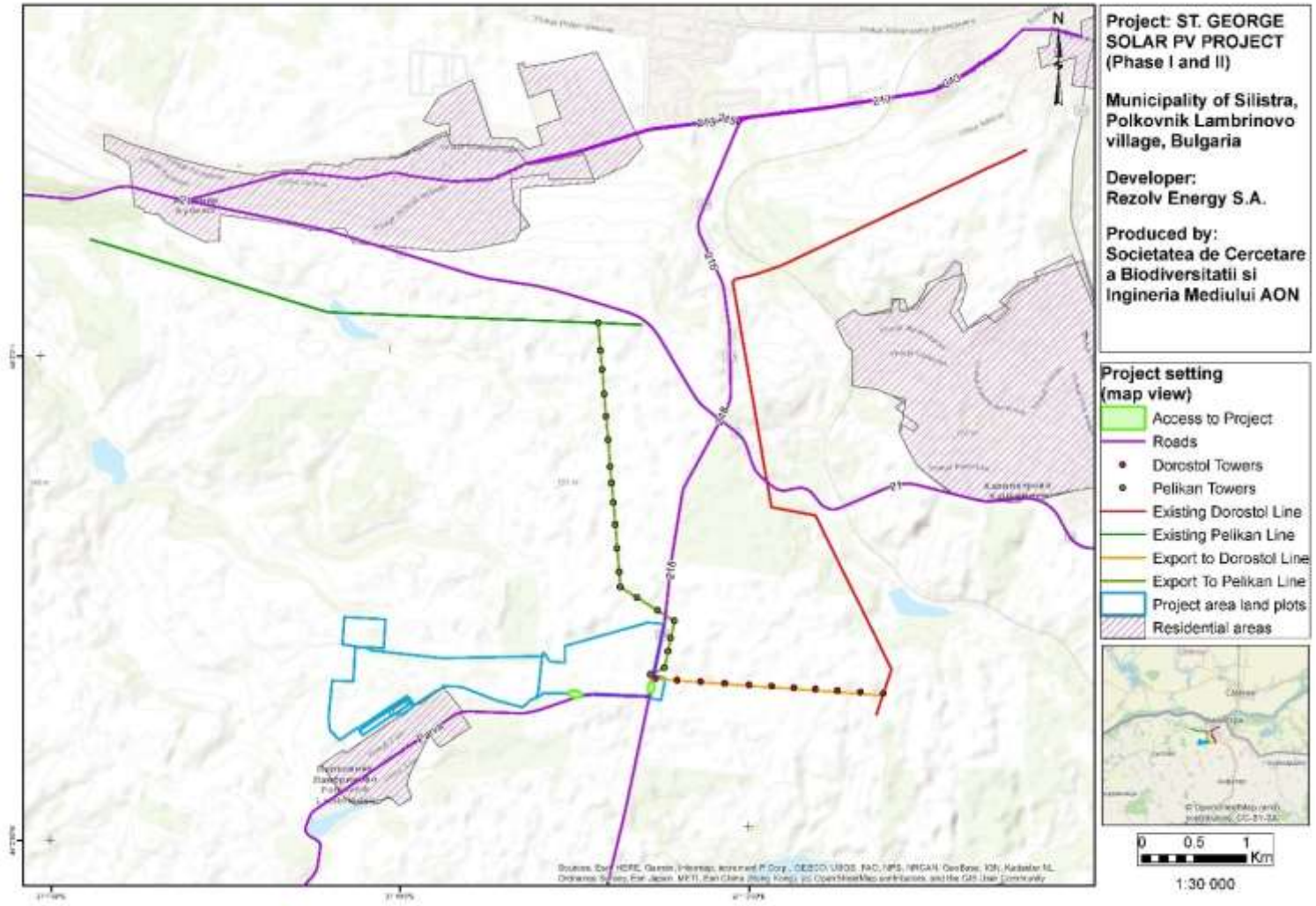


Figure 1: St. George Solar PV Project Location Map

1.3 PROJECT RECEPTORS

The nearest villages from the PV Site and OHTL route are:

- Polkovnik Lambrinovo – adjacent to the site (direct project affected community)
- Smilets – approx. 1,9 km (direct project affected community)
- Tsenovich – approx. 3,5 km
- Kalipetrovo – approx. 2,8 km (direct project affected community - OHTL)
- Aydemir – approx. 3,6 km (direct project affected community - OHTL)
- Silistra – approx. 5,7 km
- Babuk – approx. 6.0 km (village centre)

The approximate boundaries for the administrative areas of each village are depicted in **Error! Reference source not found.**. Most of the land around the site is agricultural and other receptors include agricultural users, farm workers and road users.

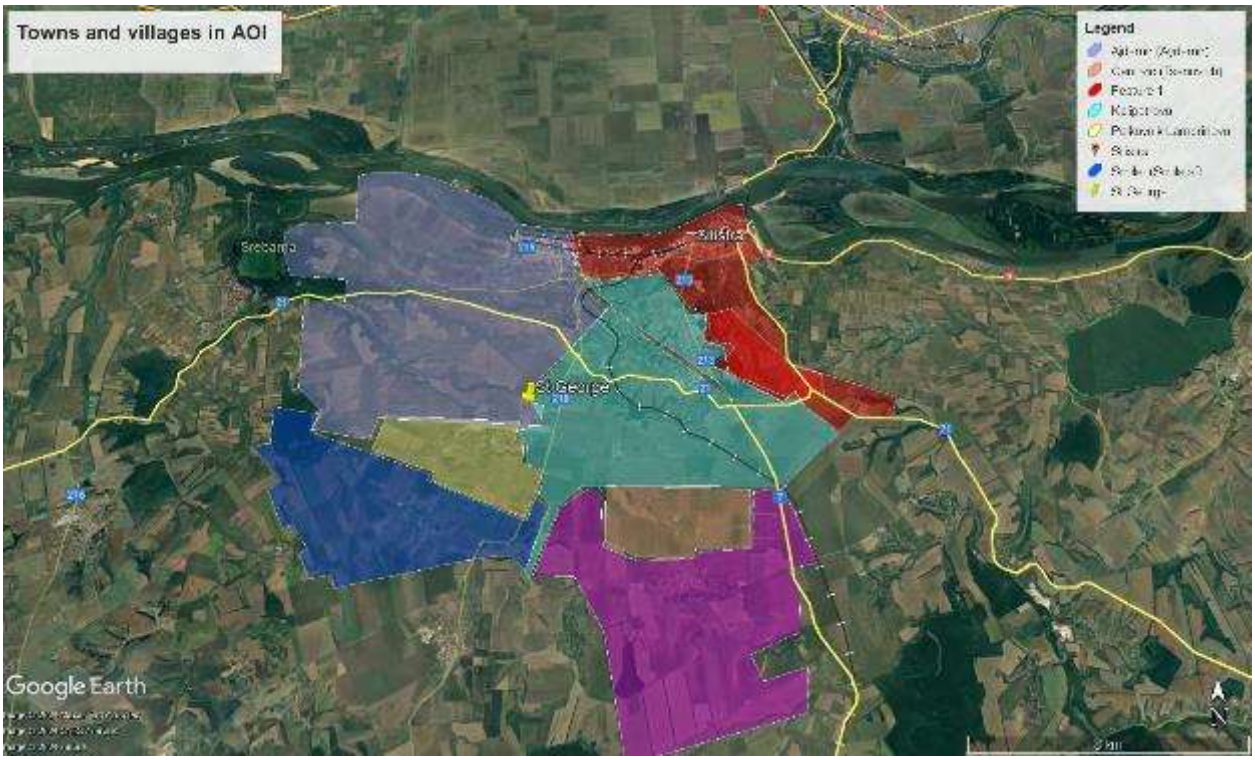


Figure 2: Towns and villages administrative areas (approximate)

The residential areas are further illustrated below.

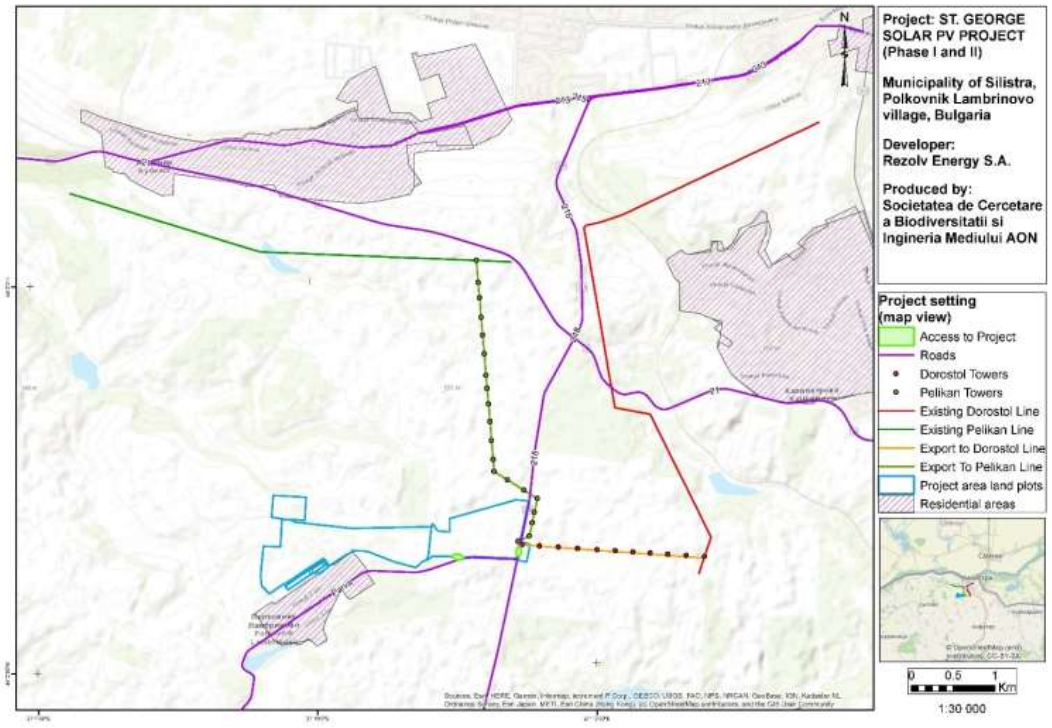


Figure 3: Residential areas in the direct AOI.

The project is located outside the boundaries of any natural protected area, the closest natural protected area being the BG0000169 Ludogorie – Srebarna (L-S Project Area) which comes within 10m of the protected area as per figure below.

Figure 4: Nearest Protected Area

2.0 ST. GEORRGE SOLAR PV PROJECT ESHS MANAGEMENT SYSTEM

2.1 PROJECT OWNER'S MANAGEMENT SYSTEM CONCEPT

The Project ESHS Management System is based on a four-step iterative process aligned with the Plan-Do-Check-Act model, as represented in Figure 2 overleaf. The concept reflects an adaptive management loop that accommodates changes that occur as the Project moves through the various implementation stages.

All of the main activities corresponding to the above four components of the Project ESHS management system are described in the following sections of this ESMP (to facilitate reader orientation, the respective stage of **[PLAN], [DO], [CHECK], [ACT]** is indicated at the subsection headings).

The Plan-Do-Check-Act model was transposed in the Project's ESHS Management System following a staged approach, organized in three levels (from A to C), as represented in Figure 5.

This process is initiated with the identification of the applicable requirements, regulations and standards and the definition of the principles and leadership commitments stated in the R-Engineering EOOD Code of Conduct & Business Ethics and ESHS Policies[2]. Subsequently, the Project's ESHS risks and impacts were identified and assessed based on the ESIA package of studies performed for the St. George Solar PV Project. The ESIA identified the embedded ESHS controls[3] and defined the mitigation measures required to address the residual ESHS impacts and ensure that the Project requirements, regulations and standards are met. Addressing the ESHS risks and impacts represents a Project commitment, specifically a commitment by the Project Owner to ensure that these measures will be implemented during the Project execution – either by the Project Owner themselves or via the EPC or other parties.

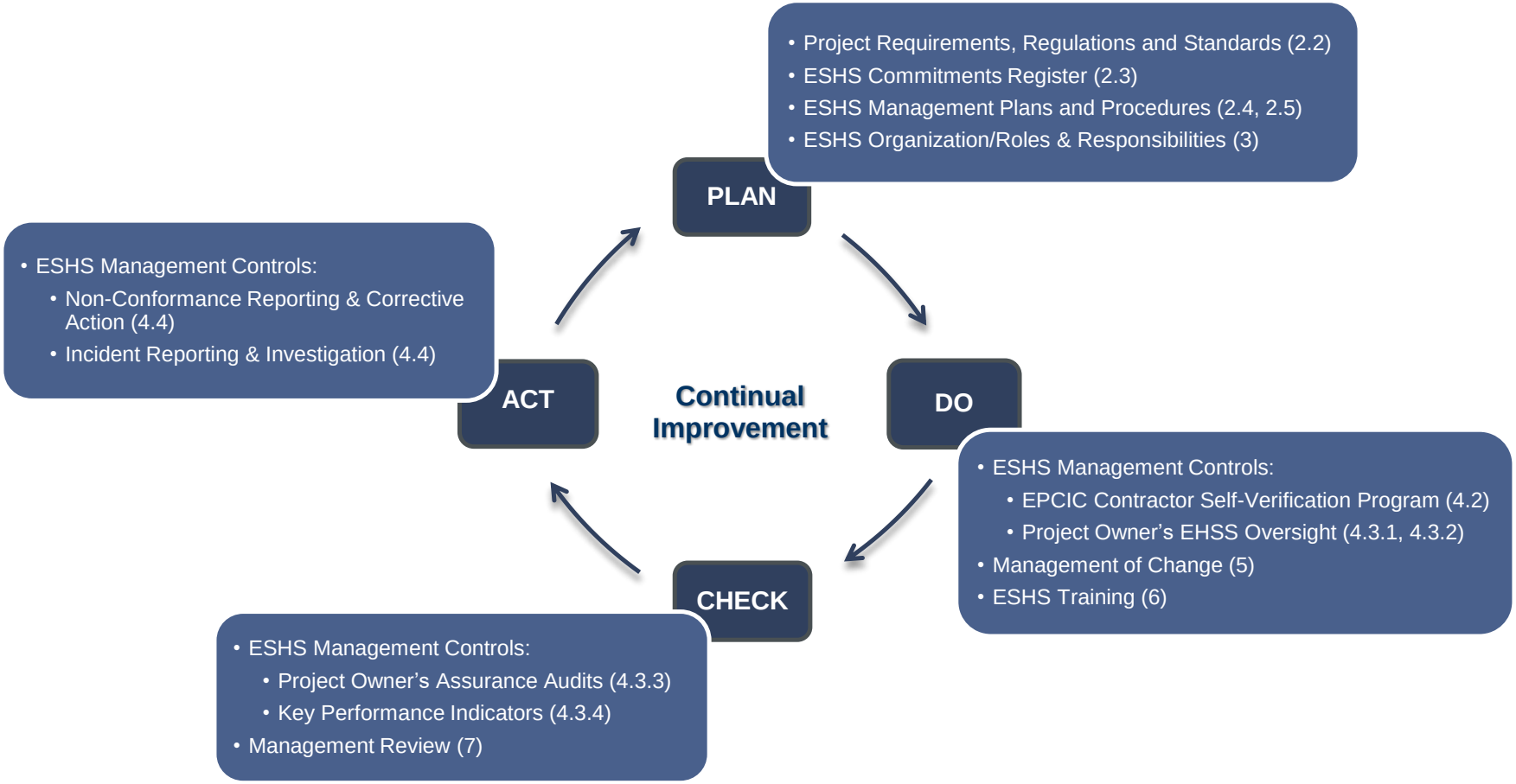
The ESHS mitigation measures that resulted from the ESIA process were transposed into a Commitments Register, serving as a tool which informs this ESMP and the subordinated ESHS management planning and processes to be implemented at the various levels of the Project organization.

This ESMP is a critical component of the Project ESHS risk management system, providing an overview of the processes and tools to manage Project ESHS risks within the frame of the Plan-Do-Check-Act model. The ESMP also sets the requirements for the management planning (operational controls, performance review and evaluation) to be established and maintained by the Project Owner and the EPC Contractors.

The above-indicated management system concept and the relationship between the ESMP, the Project requirements, regulations and standards (see section 2.2), and the management plans at the various levels of the Project ESHS Management System is represented in overleaf. Each Project ESHS management system component indicated above and represented in Figure 6 is detailed in the following sections of this ESMP.

22 Drafting note: Currently under development

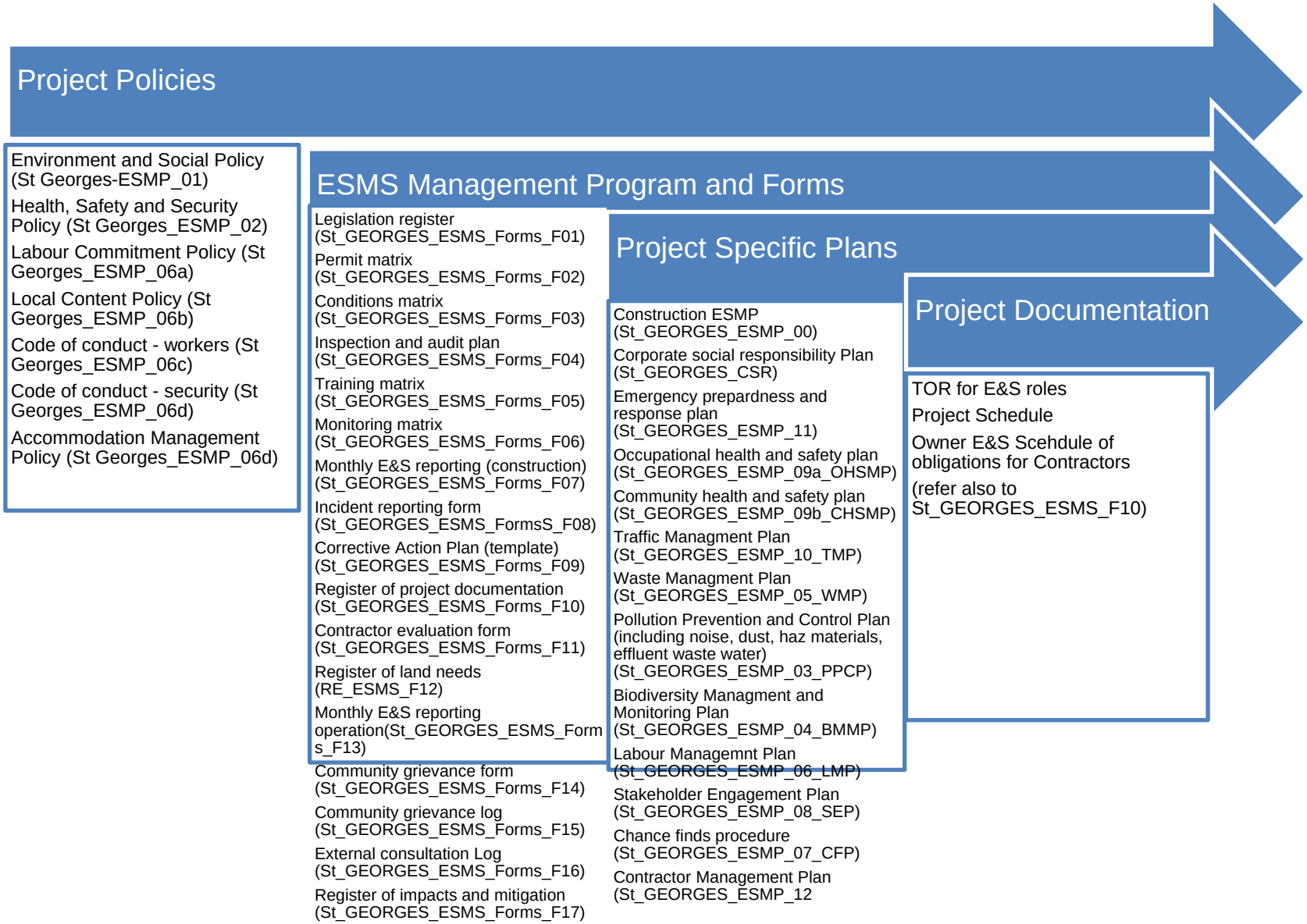
3 The term "Embedded Controls" refers to those protective measures that are anyhow already included in the approved Project Design, such as high-efficiency boilers, air filters, wastewater treatment, etc. – therefore such items do not normally need to also be added as a further commitment.



(Numbers in brackets indicate the ESMP chapters detailing the respective topics)

Figure 5: St. George Solar PV Project ESHS Management System Process

Figure 6: St. George Solar PV Project ESHS Management Planning Structure


Project Policies
Environment and Social Policy (St Georges-ESMP_01)
Health, Safety and Security Policy (St Georges_ESMP_02)
Labour Commitment Policy (St Georges_ESMP_06a)
Local Content Policy (St Georges_ESMP_06b)
Code of conduct - workers (St Georges_ESMP_06c)
Code of conduct - security (St Georges_ESMP_06d)
Accommodation Management Policy (St Georges_ESMP_06d)
ESMS Management Program and Forms
Legislation register (St_GEORGES_ESMS_Forms_F01)
Permit matrix (St_GEORGES_ESMS_Forms_F02)
Conditions matrix (St_GEORGES_ESMS_Forms_F03)
Inspection and audit plan (St_GEORGES_ESMS_Forms_F04)
Training matrix (St_GEORGES_ESMS_Forms_F05)
Monitoring matrix (St_GEORGES_ESMS_Forms_F06)
Monthly E&S reporting (construction) (St_GEORGES_ESMS_Forms_F07)
Incident reporting form (St_GEORGES_ESMS_FormsS_F08)
Corrective Action Plan (template) (St_GEORGES_ESMS_Forms_F09)
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Register of land needs (RE_ESMS_F12)
Monthly E&S reporting operation(St_GEORGES_ESMS_Forms_F13)
Community grievance form (St_GEORGES_ESMS_Forms_F14)
Community grievance log (St_GEORGES_ESMS_Forms_F15)
External consultation Log (St_GEORGES_ESMS_Forms_F16)
Register of impacts and mitigation (St_GEORGES_ESMS_Forms_F17)
Project Specific Plans
Construction ESMP (St_GEORGES_ESMP_00)
Corporate social responsibility Plan (St_GEORGES_CSR)
Emergency prepardness and response plan (St_GEORGES_ESMP_11)
Occupational health and safety plan (St_GEORGES_ESMP_09a_OHSMP)
Community health and safety plan (St_GEORGES_ESMP_09b_CHSMP)
Traffic Managment Plan (St_GEORGES_ESMP_10_TMP)
Waste Managment Plan (St_GEORGES_ESMP_05_WMP)
Pollution Prevention and Control Plan (including noise, dust, haz materials, effluent waste water) (St_GEORGES_ESMP_03_PPCP)
Biodiversity Managment and Monitoring Plan (St_GEORGES_ESMP_04_BMMP)
Labour Managemnt Plan (St_GEORGES_ESMP_06_LMP)
Stakeholder Engagement Plan (St_GEORGES_ESMP_08_SEP)
Chance finds procedure (St_GEORGES_ESMP_07_CFP)
Contractor Management Plan (St_GEORGES_ESMP_12
Project Documentation
TOR for E&S roles
Project Schedule
Owner E&S Scehdule of obligations for Contractors
(refer also to St_GEORGES_ESMS_F10)

2.2 PROJECT REQUIREMENTS, REGULATIONS AND STANDARDS [PLAN]

R-Engineering EOOD and its EPC Contractors are required to meet a number of key ESHS requirements, regulations and standards as outlined below. This ESMP is intended to support the transposition of these standards into Project implementation.

These Project requirements, regulations and standards represent the basis of the Project ESHS management system and are represented in Figure 3 – Level A.

The Project requirements, regulations and standards are explained below.

2.2.1 PROJECT OWNER'S CODE OF CONDUCT AND POLICIES

R-Engineering EOOD will develop a set of overarching ESHS company policies, as listed below, and has committed to implementing these on the Project to guide and ensure conformance to the Project Requirements, Regulations and Standards. These apply to all activities, including the construction works program and all staff working on the Project:

- Project Environment and Social Policy (RE-ESMS_01) (Annex A)
- Project Health, Safety and Security Policy (RE-ESMS_02) (Annex B)
- Project Labour Commitment Policy (RE_ESMS_06a)
- Project Local Content Policy (RE_ESMS_06b)
- Project Code of conduct - workers (RE_ESMS_06c)
- Project Code of conduct - security (RE_ESMS_06d
- Worker Accommodation Policy (RE_ESMS_06e)

These policies establish the framework for the Project's environmental, social, health and safety management processes as further developed and defined within this ESMP.

Other relevant Owner (Corporate) Policies

- Anti-bribery and corruption policy
- Code of conduct and ethics
- Contracts and Procurement Policy
- Cyber Security Policy
- Equal Opportunity and Discrimination Policy
- Health and Safety Policy for Outside the workplace and Site Visits
- Corporate Health and Safety Policy
- Personal data and Processing Policy
- Speak up Policy
- Supplier Code of Conduct

2.2.2 NATIONAL LEGISLATION AND PERMITTING

Appendix A summarises key environmental legislation documents applicable to St. George Solar PV Project.

The Project Owner and its EPC Contractor will comply with all national laws, regulations and codes of practice requirements and fulfil all applicable regulatory requirements.

To ensure this, the Project Owner will maintain a Legal Register (F001) and Permit and Conditions Register (F002) throughout the project life cycle to consolidate all applicable environmental and social compliance obligations for the St. George Solar PV Project.

The EPC Contractor will set up a process for tracking and implementing any relevant regulatory changes and requirements updates for their activity.

The **Permit register** constitutes an integral part of the EPC Contract. The up-to-date version of the register (updated as changes occur) is available at all times for both the Project Owner and the EPC Contractor though the document sharing and communication platform established for the Project.

2.2.3 EU AND INTERNATIONAL LEGISLATION

International conventions and protocols

International conventions ratified by Bulgaria and relevant to the St. George Solar PV Project include the following:

- United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters 1998, ratified by Law no. 86/2000 (Aarhus Convention);
- The Kyoto Protocol on Climate Change (UNFCC)
- The United Nations Convention on Biodiversity 1992 ratified by Law no. 58/1994
- Convention on the Conservation of European Wildlife and Natural Habitats, 1979, ratified by Law no. 13/1993 (Bern Convention);
- Convention on Conservation of Migratory Species of Wild Animals, 1979, ratified by Law no. 13/1998 (Bonn Convention);
- International Union for Conservation of Natural Resources Red List of Threatened Species
- European Convention on the Protection of the Archaeological Heritage, 1992, ratified by Law no. 150/1997 (La Valetta Convention);
- European Landscape Convention, 2000, ratified by Law no. 451/2002 (Florence Convention);
- The Basel Convention 1989
- The International Labour Organisation's Core Conventions;

Additional details on the above-indicated international conventions and protocols are provided in Appendix A.

International Environmental and Social Policies and Standards

- IFC Performance Standards (2012);
- World Health Organization Guidelines for drinking-water quality (2017);
- UN Voluntary Principles on Security and Human Rights;
- UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials;
- UN Code of Conduct for Law Enforcement Officials;
- International Labor Organization (ILO) Conventions.
- Applicable requirements listed in IFC's/WB General Environmental, Health, and Safety (EHS) Guidelines, relevant IFC industry specific EHS Guidelines including but not limited to:

- IFC/WB Environmental, Health, and Safety General Guidelines (2007);
- IFC/WB Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution (2007);
- IFC/EBRD Guidelines for workers accommodations (2009);
- IFC Good Practice Note on Non-Discrimination and Equal Opportunity;
- IFC Good Practice Note – Managing Retrenchment;
- IFC Handbook – ESMS Implementation;
- IFC Stakeholder Engagement- Good Practice Handbook for Companies Doing Business in Emerging Countries;
- IFC Good Practice Note – Addressing Grievances from Project-Affected Communities;
- IFC Good Practice Manual – Doing Better Business Through Effective Public Consultation and Disclosure;
- IFC Handbook for Labour and Working Conditions - Measure & Improve Your Labour Standards Performance;
- IFC Guide to Health Impact Assessment (2009);
- IFC Guide to Project-induced in-migration (2009);
- WB Guidance Note on Managing the Risks of Adverse Impacts on Communities from Temporary Project Induced Labor Influx (2006);
- IFC Good Practice Handbook to Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets (2013);
- IFC Resettlement Handbook (2002);
- IFC/WB Environmental, Health, and Safety Guidelines for Construction Materials Extraction (2007);
- IFC/WB Environmental, Health, and Safety Guidelines for Water and Sanitation (2007);
- IFC Good Practice Note Managing Contractors' Environmental and Social Performance (2017).

The applicable version of these documents, including relevant appendices and supplements, is the latest revision published at the time of writing this document.

2.3 ESHS COMMITMENTS REGISTER

Upon completion of the ESIA process, the mitigation measures addressing the project's potential impacts as defined in the ESIA package were transferred into an **ESHS Commitments Register** (the Commitments Register) (Appendix B).

The **ESHS Commitments Register** consolidates the applicable ESHS mitigation measures defined in the ESIA package as actionable measures, management and monitoring activities for implementation during Project execution stages.

The **ESHS Commitments Register** was developed in an easily understandable format, allowing it to be used as a tool by the Project ESHS staff during Project execution. For ease of use and implementation, the Commitments Register is organized to provide for each commitment indication on:

- the Project stage (i.e. construction and operation) the respective commitment applies to,
- responsibility for implementation (i.e. Project Owner or EPC or both),
- Project location/site the respective commitment applies to, and

- the Project Owner's and EPC management plan ensuring implementation of the commitment.

In turn, the Commitments Register informs the Project Owner and the EPC Contractors' Management Plans, which detail the resources and processes to be implemented to ensure the implementation of the commitments.

A printout of the Commitments Register represents an integral part of this ESMP and is provided in Annex 2 of this document. The ESHS Commitments Register includes, in the case of each item, indication of the management plan(s) ensuring the implementation of the respective commitment.

2.4 PROJECT OWNER–LEVEL ESHS MANAGEMENT PLANS [PLAN]

The Project Owner is overall responsible for implementing the Project ESHS mitigation measures. To ensure this, several topic-specific ESHS Management Sub-Plans will be produced to facilitate the implementation of Project commitments, requirements, regulations and standards.

These ESHS Management System components are represented in Figure 5 – Level B, called Project-Owner-Level Management Plans.

The Project Owner-level Construction Phase Management Plans are the following:

- Construction ESMP (St_GEORGES_ESMP_00)
- Corporate social responsibility Plan (St_GEORGES_ESMP_02_CSR)
- Pollution Prevention and Control Plan (including noise, dust, Haz materials, effluent wastewater) (St_GEORGES_ESMP_03_PPCP)
- Biodiversity Management and Monitoring Plan (St_GEORGES_ESMP_04_BMMP)
- Waste Management Plan (St_GEORGES_ESMP_05_WMP)
- Labour Management Plan (St_GEORGES_ESMP_06_LMP)
- Chance finds procedure (St_GEORGES_ESMP_07_CFP)
- Stakeholder Engagement Plan (St_GEORGES_ESMP_08_SEP)
- Occupational health and safety plan (St_GEORGES_ESMP_09a_OHSMP)
- Community health and safety plan (St_GEORGES_ESMP_09b_CHSMP)
- Traffic Management Plan (St_GEORGES_ESMP_10_TMP)
- Emergency preparedness and response plan (St_GEORGES_ESMP_11)
- Contractor Management Plan (St_GEORGES_ESMP_12)

Livelihoods Restoration Plan (St_GEORGES_ESMP_13)

Supporting forms and templates developed as part of the project ESMS for implementation of the ESMP and supporting management plan requirements are as follows:

- Legislation register (St_GEORGES_ESMS_Forms_F01)
- Permit matrix (St_GEORGES_ESMS_Forms_F02)
- Conditions matrix (St_GEORGES_ESMS_Forms_F03)
- Inspection and audit plan (St_GEORGES_ESMS_Forms_F04)
- Training matrix (St_GEORGES_ESMS_Forms_F05)
- Monitoring matrix (St_GEORGES_ESMS_Forms_F06)

- Monthly E&S reporting (construction) (St_GEORGES_ESMS_Forms_F07)
- Incident reporting form (St_GEORGES_ESMS_FormsS_F08)
- Corrective Action Plan (template) (St_GEORGES_ESMS_Forms_F09)
- Register of project documentation (St_GEORGES_ESMS_Forms_F10)
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- Monthly E&S reporting operation (St_GEORGES_ESMS_Forms_F13)
- Community grievance form (St_GEORGES_ESMS_Forms_F14)
- Community grievance log (St_GEORGES_ESMS_Forms_F15)
- External consultation Log (St_GEORGES_ESMS_Forms_F16)

The Project ESHS Management Sub-Plans detail the management and implementation processes required to achieve commitments, requirements, regulations and standards. The main roles of the Project ESHS Management Plans are to:

- Define the processes in place to ensure that the Project Owner as an organization implements the Project commitments, requirements, regulations, and standards under their direct responsibility.
- Define the compliance and assurance processes, ensuring that the work planned and performed is conducted according to the Project ESHS commitments, requirements, regulations and standards.
- Ensure that the Project Owner implements ESHS oversight of the EPC Contractors to measure the effectiveness of their self-verification processes with ESHS commitments, requirements, regulations and standards;
- Define and communicate to the EPC Contractors the requirements regarding the specific management procedures they must implement during Project execution.

The Project Management Sub-Plans will be structured to include but not be limited to the topics in the following table.

Table 2-1 Project Owner-level Construction ESHS Management Plans

No.	Project ESHS Management Plan	Aspects covered

003	**Pollution Prevention and Control Plan**	• General pollution prevention and protection measures
		• Pollution prevention and protection measures at hazardous materials storages, such as bunding storage areas, tank overfilling prevention measures, etc.
		• Spill prevention containment measures around sensitive equipment, installation of appropriate spill clean-up equipment and development of response procedures
		• Measures at source to prevent pollutants from entering the pathway
		• Actions to be followed in case pollutants enter the pathway
		• Management of spill-contaminated soil
		• Wastewater discharge and management
		• Construction dust mitigation and monitoring
		• Noise management,
		  ○ Noise abatement/mitigation measures
		  ○ Noise monitoring
		• Hazardous materials storage and handling

No.	Project ESHS Management Plan	Aspects covered
004	**Biodiversity Management Plan (inc. AIS)**	• Plan for implementing mitigation measures identified in the ESIA related to the Project's impact on biodiversity. • Mitigation strategy (how the mitigation hierarchy has been followed) • Requirements for pre-construction check surveys • Management and monitoring measures during the construction phase of the project • Roles and responsibilities • Measures to avoid the introduction and/or spreading of invasive alien species
005	**Waste Management Plan**	• Non-hazardous and hazardous waste management, including: o Waste hierarchy implementation (i.e. reduction at source, reuse, recycling, energy recovery, responsible disposal); o Identification and classification of wastes; o Waste register; o Waste handling (i.e. collection, segregation and containers, storage, treatment, transport and documentation, disposal); o Waste duty of care process (waste transfer, waste consignment provisions); o Monitoring and reporting.
007	**Labour Management Plan**	• Training and skill development activities; • Employee grievance mechanism; • Camp and worker accommodation management aspects • Measures for fair treatment, non-discrimination, and equal opportunity in employment. • Requirements related to the provision of safe and healthy working conditions and the health of workers • Management of potential communicable diseases associated with the construction workforce. • Behavioural code of conduct for workers when outside of work and interaction with the local community • Contractor employment practices conformance, reporting and monitoring • Management measures related to child labour, forced labour, and third-party workers.
006	**Chance finds procedure**	• Chance finds procedure • Chance finds training, management and response • Interface and coordination with relevant authorities
008	**Stakeholder Engagement Plan (including external grievance mechanism)**	• Stakeholder identification and mapping • Stakeholder analysis • Previous engagement activities • Stakeholder engagement plan and record-keeping • Grievance mechanism • Monitoring and evaluation • Internal and external reporting • Roles and responsibilities
009 a	**Occupational Health and Safety Management Plan**	• Safety principles and philosophy • H&S policies and commitments • Project H&S objectives • H&S management system structure • H&S leadership, organization, competence, communication • Contractors H&S management • PPE requirements and enforcement • Non-conformances and incident reporting, investigation and lessons learned • H&S audit & review

No.	Project ESHS Management Plan	Aspects covered
		• H&S performance monitoring/ improvement • H&S records and documents control

008 b	**Community Health, Safety and Security Management Plan Security Management Plan**	• Security arrangements roles and responsibilities
		• Site access (project personnel identification, visitors identification, vehicles identification etc.)
		• Security-related communication arrangements
		• Interface with host government agencies and public security forces
		• Provisions to ensure compliance with regulations and good industry practice regarding:
		  ○ Security personnel selection and employment
		  ○ Security personnel rules of conduct,
		  ○ Security personnel training, equipment
		  ○ Monitoring of compliance and investigation process of non-compliance acts
		• Security training program including:
		  ○ Code of Conduct modules specific to security personnel
		  ○ Voluntary Principles on Security and Human Rights
		• Grievance mechanism

001 0	**Traffic Management Plan**	General management plan defining common control measures, standards and procedures for construction traffic management aimed at guiding contractors on applicable construction traffic planning and management requirements. • Site access and haulage routes (for general and over-dimensioned vehicles) • Road traffic management including on-site and off-site/public roads speed limits, vehicle inspection requirements, operating rules and procedures • Dust, air emissions, noise abatement requirements and measures • Access roads management • Road-related accidents prevention • Local traffic signage • Timing of deliveries • Road's closure • Road's cleaning • Abnormal load road safety and management requirements • Communication in advance of heavy and abnormal load construction traffic through communities • Training of drivers and equipment operators • Community awareness program on traffic-related risks, in line with SEP provisions • Monitoring system • Internal monitoring and reporting Contractor traffic and transportation management planning requirements.
011	**Emergency Preparedness and Response Plan**	Provision of a consistent and systematic approach to ensure effective control and management of emergencies that may be encountered during project development on project sites. • roles and responsibilities, chain-of-command and communication framework • decisional workflow in case of emergency • different emergency tiers response teams: • notification procedure • potential emergency scenarios and their management • media and public relations during emergency • training and drills requirements • emergency contact details
012	**Contractor Management Plan**	• Subcontractor pre-qualification criteria • Subcontractor onboarding requirements

No.	Project ESHS Management Plan	Aspects covered
		• Define the approach to managing the E&S performance of contractors, subcontractors, and other third parties during the various phases of the project. • Program for audit of E&S performance of EPC contractors and subcontractors, specifying the frequency of audit (at least monthly during the construction phase), reporting and roles and responsibilities
012	**Livelihoods Restoration Framework**	• Livelihood restoration principles and activities • Eligibility and entitlements • Planning and implementation • Monitoring and evaluation • Accidental damages compensation process for future unforeseen impacts.
		•

2.5 CONTRACTOR-LEVEL ESHS MANAGEMENT PLANS [PLAN]

EPC Contractors are responsible for the implementation of the ESHS mitigation associated with the execution of the Project construction activities.

To ensure this, the EPC Contractors are required to define and implement their own ESHS compliance monitoring and assurance processes for the Project. These will be outlined in EPC Environmental and Social Management Plan (EPC-ESHS PLAN) and topic-specific Contractor Management Plans (CMP).

CMP, in the sense used throughout this ESMP is the generic term for the Management Plans, Procedures and Method Statements defined and implemented by contractors and incorporating the mitigations addressing the specific ESHS impacts associated with their operations, as guided by this ESMP and the Project Owner-level ESHS Management Plans.

These ESHS Management System components are represented in Figure 6 – Level C and referred to as Contractor Management Plans (CMP).

Each EPC Contractor is required to ensure that all requirements set in the Project-level ESHS Management Plans, and which are relevant to the EPC and their subcontractors' activities are transposed and detailed in the EPC-ESHS PLAN and the CMPs.

The CMPs will be compliant with the ESIA package documents, the Commitments Register, the Project Requirements Regulations and Standards referred to in section 2.2 of this ESMP including national and EU regulations, EBRD PRs and IFC PSs.

The Project Owner will review and approve the EPC-ESHS PLAN and the CMPs in line with the Project documents approval process.

No construction work is allowed to be performed by the EPC or its subcontractors until the EPC-ESHS Plan and CMPs are pre-approved by the Project Owner, in line with the Project's formal documents approval process.

2.5.1 EPC CONTRACTOR ESHS PLAN (EPC-ESHS PLAN)

The EPC-ESHS Plan is the operational control document defining EPC Contractor's self-verification and assurance processes to ensure the Project ESHS commitments are implemented at site level.

The EPC-ESHS Plan will detail the roles and responsibilities, the self-verification and assurance processes put in place at the EPC organization level to ensure the requirements of this Project ESMP and the ESHS Commitments are met. This will include all aspects related to staffing, roles and

responsibilities, resources, self-verification and assurance processes, communication, and management of non-conformances.

The EPC-ESHS Plan will be structured to provide the information in the following table.

Table 2-2 EPC-ESHS Plan content

EPIC-HSE Plan Suggested Sections	EPC-ESHS Plan Required Content
Introduction	• Purpose & objective • Reference to EPC ESHS Policies and Procedures • Applicable ESHS Requirements, Regulations and Standards
Project ESHS Management	• EPC Project ESHS management concept • EPC ESHS Project management documents (EPC-ESHS Plan, CMPs, Subcontractor Method Statements, ESHS requirements etc.)
Project Organization	• Overall EPC ESHS Project Organization • EPC ESHS Staffing, Roles and Responsibilities
ESHS Management Controls	• EPC ESHS Self-verification (daily/weekly etc., oversight inspections of own and subcontractor activities, joint inspections with Project Owner, monitoring etc.) • EPC ESHS Assurance (internal and external audits, management review etc.) • Action Tracking System (system for recording and monitoring of ESHS corrective actions/measures until closure) • Non-conformity Notification, Recording and Corrective Action (ESHS NCR system) • ESHS Incident Reporting and Investigation • ESHS Monitoring Program • ESHS Reporting (daily, weekly, monthly, KPI reporting etc.) • ESHS Documentation Management (ESHS records management)
Subcontractors Management	• Roles & responsibilities • Subcontractor ESHS management planning/method statement requirements • Subcontractor requirements for ESHS self-monitoring and reporting to EPC
Communication Arrangements	• Internal Project communication arrangements (EPC – Project Owner communication) • External communication (communication with authorities, external Project stakeholders, etc.) • Emergency communication arrangements
ESHS Training Program	• Types of ESHS training • Training planning, delivery and tracking
Change Management[4]	• ESHS Change Management Process (interfaces with overall Project Change Management process) • ESHS assessment of Project/Design changes.

The structure provided in the table above is a suggestion only. While the EPC may alter the structure of the HSE Plan as needed to align with its management system requirements, the above-indicated content is to be included as a minimum and in a user-friendly and fit-for-purpose format.

2.5.2 EPC CONTRACTOR HUMAN RESOURCES POLICY

The EPC Contractor will also provide overarching human resources (HR) policies demonstrating compliance with legal and other requirements stipulated in this ESMP (e.g. IFC PS2). The policy will include detailed information on workforce induction, information on rights, child and forced labour, equal opportunity, migrant workers, promotion of local employment opportunities, labour unions, worker

[4] A process for requesting, determining feasibility, planning, implementing, and evaluating Project changes.

accommodation requirements, provision for retrenchment plans, security personnel, influx management etc. The EPC Contractor will ensure that core labour requirements align with legislation and other requirements and are cascaded down to contracting chains to all subcontractors and suppliers of core materials. The EPC Contractor must be able to evidence this transfer of responsibilities down the contracting chain. Each sub-contractor must demonstrate an HR Policy aligned with the EPC HR Policy.

2.5.3 EPC CONTRACTOR CONSTRUCTION MANAGEMENT PLANS (CMP)

The CMPs required to be put in place by the EPC Contractor will generally mirror the topics addressed in the Management Plans set at Project owner level (see Figure 3 – Level B). However, the CMPs are required to present further site-specific implementation details, i.e., how the EPC Contractor and its subcontractors will implement the requirements outlined in the corresponding Project-level Management Plans and in the EPC Contract.

As indicated above, to allow flexibility to the EPC Contractor in defining procedures in line with their own management system process, the mitigation measures addressing the specific ESHS impacts may be defined in Management Plans, Procedures and Method Statements (generically referred to herein as CMPs), as deemed appropriate by the EPC Contractor. However, the EPC Contractor is to ensure that CMPs addressing the below-indicated specific topics are defined and implemented throughout the Project execution:

- Environment, Pollution Prevention and Control CMP (including, among others, air, noise, water supply and wastewater, biodiversity, spill prevention, contaminated land and hazardous materials management)
- Topsoil Management and Site Reinstatement CMP
- Waste Management CMP
- Chance Finds Procedure (pertaining to earthworks operations).
- Workforce CMP (including employment, working conditions and worker accommodation aspects)
- Traffic and Transport (Logistics) CMP
- Occupational Health and Safety Management Plans and Procedures
- Emergency Preparedness and Response Plan
- Security Management CMP (general/applicable Project-wide and site-specific, as needed).
- Subcontractor Management CMP (for management of EPC second and third-tier subcontractors and subcontractor management of their subcontractors)

In defining the mitigation and management measures to be covered by the above-indicated CMPs, the EPC Contractor will use as guidance, in addition to the present ESMP provisions the Project ESIA and the Commitments Register provided in appendix to this ESMP.

St. George Solar PV Project stakeholder engagement activities and community relationships will be managed by the Project Owner in line with the Project Stakeholder Engagement Plan (004). While contractors are not required to perform Project-related stakeholder engagement, the Project Owner will work with the contractors to ensure that their CSR-related activities will align with those the Project Owner envisaged, as applicable.

The EPC ESHS CMPs will be informed by the Project (Company)-level ESHS Management Plans (refer to section 2.6 above) and shall be generally structured to provide the following information:

- Objectives of the management plan/purpose and scope,
- Reference documents (indication of other Project-level documents and EPC CMPs of relevance for the management plan; reference to relevant applicable standards);

- Identification of Project activities/operations associated with the impacts addressed by the respective CMP and triggering the implementation of all or part of the respective CMP requirements;
- Description of management practices employed to implement impact mitigation and ensure accomplishment of related commitments;
- Roles and responsibilities;
- Subcontractors' requirements (including those addressing ESHS aspects in the subcontractor method statements);
- CMP requirements implementation monitoring and reporting; staff training needs.

2.6 OPERATIONAL ESHS MANAGEMENT FRAMEWORK

This section provides a framework for the ESHS Management planning to be put in place for the operational stage of the Project. The ESHS Management during operation will ensure that the mitigation measures to be implemented at the operational stage as defined in the Project ESIA and all ESHS commitments applicable at the operational stage are met.

It is envisaged that for the management of the ESHS aspects associated with the operation stage, a similar approach to the management processes detailed in this ESMP will be considered for the ESHS management and performance monitoring.

It is currently envisaged that the operation-stage ESHS Management Framework will comprise the following topic-specific ESHS management aspects:

- Pollution Prevention Management Plan (including, among others, noise, spill prevention, contaminated land and hazardous materials management)
- Site Reinstatement Monitoring Plan
- Occupational H&S Management Plan
- Emergency Preparedness and Response Plan.
- Stakeholder Engagement Plan;
- Community Investment Plan.
- Livelihood Restoration plan (if ongoing obligations are applicable)

These operation-stage management plans will be based on the construction management plans, modified based on lessons learned and anticipating the activities of the operations phase. It is expected that the operation stage ESHS management planning documents will be more concise and targeted specifically at the operation of the solar PV site.

The structure of the operational stage management plans will generally follow the requirements applicable for the construction management plans as specified in this ESMP, adapted to meet operation stage risks and issues as needed.

The above-indicated framework is indicative at this stage and will be refined at the stage of the operational readiness planning. The ESMP will therefore be updated in response to this, not later than 2 months before the St. George Solar PV Project enters operation.

3.0 ESHS PROJECT ORGANISATION

3.1 ESHS MANAGEMENT PROJECT ORGANIZATION

The Project Owner's ESHS management roles are represented in Figure 4[5].

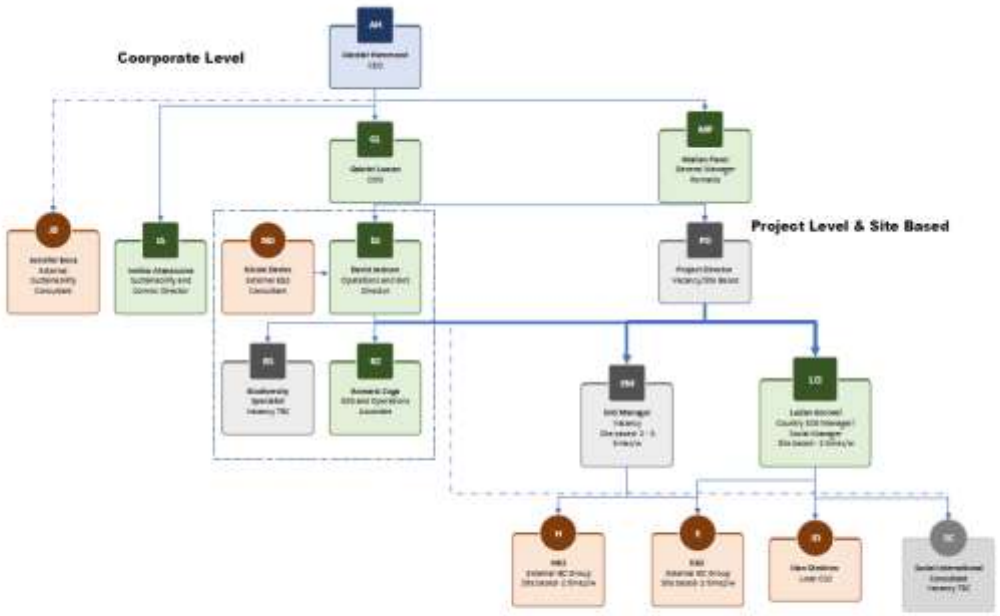

Figure 7: Project Owner's Project ESHS Organization Chart

3.2 PROJECT OWNER'S ESHS ROLES AND RESPONSIBILITIES [PLAN]

The Project Owner is ultimately responsible for ensuring that all Project activities comply with the Project ESHS policies, regulations and standards. The Project Owner will therefore establish an appropriate organizational structure, responsibilities, practices and will ensure the resources necessary for the ESHS management during the Project execution. Indicated staff may sit within Project Owner or may be part of the Owner's Engineer organization.

Specific main responsibilities of key Project Owners staff are summarized in Table 3-1 below. The staff job descriptions detailing individual responsibilities will be aligned with the requirements summarized herein.

Table 3-1 Key Project Owner staff and associated responsibilities

[5] Names to be completed for next revision prior to start of construction

Role	Responsibility
Project Director	• Overall accountability for the Project including delivery in line with applicable national and international standards. • Ensures allocation of sufficient resources for the ESMP and supporting sub-plan implementation including for ESHS organization, permitting, training, equipment and qualified personnel. • Ultimate responsibility for ensuring implementation of required corrective actions including in response to identified ESHS non-compliances or incidents. • Ensures periodical review of the ESMP effectiveness in line with the provisions of this plan.
ESG Manager/ Project Social Manager	• Appropriately qualified professional familiar with ESHS aspects associated with internationally financed projects implementation. • Performing duties both at corporate level and partially on site. • Performing duties both at corporate level and supporting on site CLO. • Provide functional support to the field staff to implement the social requirements of this ESMP and of the Project Owner's management system; • Coordinate the implementation of the Stakeholder Engagement Plan; • Provide timely information to communities on all Project works through regular meetings with stakeholders and ensure that long term relationships are not negatively impacted. • Provide information on potential issues with local communities and stakeholders and contribute to implementing specific measures to prevent and mitigate risks. • Identify key stakeholders, requiring engagement in the frame of Project stakeholder engagement processes/activities and update regularly the stakeholder mapping in response to stakeholders' activities and their relationship with the Project. • Monitor local developments with potential to impact Project activities, and report to the Project Manager. • Ensure that stakeholder engagement activities are documented and evidence (e.g. Minutes of Meetings) are kept on file. • Perform regular review and monitoring of SEP implementation. • Coordinate and manage implementation of the Project Grievance Mechanism. o Ensure Project Grievance Committee Meetings are formally documented and recorded; o Coordinate preparation of responses to complainants and agree content with other members of the Project Grievance Committee; o Responsible for ensuring responses to complainants are provided in line with the Grievance Mechanism provisions o Report to Project Management Team on grievance management. • Take active role in the in the identification of community needs and assist in the decision process regarding Project Owner's community investment program. • Responsible for the successful implementation of Project Owner's community investment program. • Oversee Project external communications; • Responsible for the Project information disclosure, mass media coverage/press releases.

Role	Responsibility
EHS Manager	• Oversee implementation of the Employer's Construction Management Plan (including supporting sub-plans) • Oversee implementation of Contractor ESHS Manaagmeent plans and supporting documentation for use on-site • Liaise on a day to day basis with the Contractor ESHS Manager. • Daily site walkarounds • Ensure that all Contractors adhere to the ESHS policies • Monitor implementation of Contractor OHS procedure and advise Contractor (s) to drive the implementation of national and Lender standards and procedures at the site • Review and approve Contractor ESHS procedures (as requested in this document) before work commences. • Review and comment on method statements (Any "strong" comments will be subject to discussion and clarification with the EPC Contractor) • Collate, report and submit all ESHS monthly incident statistic reports as reported by Contractor • Conduct weekly inspections and monthly audits on behalf of the Employer and to ensure corrective actions are monitored and documented as required by this ESHS CMP (including worker audits an audit of CF procedures) • Confirm that all site personnel and employees are informed of site safe working procedures and practices so that they can fulfil their responsibilities. • Verify Contractor provisions for medical preparedness and facilities are readily available for all employees and that records are adequately maintained • Verify adequacy of contractor Emergency Preparedness, including appropriate training and test run scenarios and to ensure contingency plans are current. • Liaise with Site Manager to provide regular updates regarding ESHS matters • Oversee incidents investigation or near-miss events as necessary or required. Including compilation and completion of any required documentation • Analyse root causes to determine safety measures to prevent future incidents and influence the implementation of corrective actions • Ensure efficient ESHS communication via ESHS Committee Meetings, attendance and sharing information from HSE meetings • Provide out of hours emergency contact service • Oversee implementation of management of known sites of cultural heritage importance.
H&S Supervisor	• Perform oversight inspections of the EPC Contractors' and subcontractors' activities to ensure they align with Project, health and safety management requirements and with the CMPs/method statements provisions pertaining to health, safety and environment. • Provide feedback on inspections findings to the EHS Manager. • Provide HSE advice and training/deliver toolbox talks to field teams. • Report on HSE compliance and corrective actions implementation to the EHS EHS Manager. • Record HSE incidents and follow up on closure by EPC. • Participate in internal and external HSE audits. • Report to the ESHS Manager on daily basis and in agreed format on all health, safety and environmental matters and activities performed.
E&S Supervisor	• Support EHS and Social Manager to oversee delivery of deliver on site EHS activites in compliance with project requirements.

Role	Responsibility
Community Liaison Officer	• Acts as local liaison between the Project and the community/local stakeholders and maintains positive relationship with them. • Provide timely information to local community members on all Project works through regular meetings with stakeholders and ensure that long term relationships are not negatively impacted. • Provide information to Project management on potential issues with local communities and stakeholders and contribute to implementing specific measures to prevent and mitigate associated risks • Take active role in identification of community needs and assist in the decision process regarding the Project's community investment program. Contribute to the successful implementation of the Project's community investment program. • Identify key stakeholders, requiring engagement in the frame of the Project stakeholder engagement processes/activities and support with updating regularly the stakeholder mapping in response to stakeholders' activities and their relationship with the Project. • Monitor local community developments with potential to impact Project activities, and report to the Communications & Community Relations Manager. • Support with the Grievance Mechanism implementation at field level. Assist local community members in filing their grievances as needed. • Report on all activities performed to the Communications & Community Relations Manager on daily basis and agreed format.

3.2 EPC CONTRACTOR ESHS ROLES AND RESPONSIBILITIES [PLAN]

It is EPC Contractor`s responsibility to ensure that ESHS compliance is achieved according to the requirements and processes defined in this ESMP. In attaining this objective, the EPC Contractor establishes and maintains through its own ESHS Management System a documented process to identify risks and impacts, implements adequate management measures to mitigate these in line with the Project Requirements, Regulations and Standards specified in section 2.2 of this ESMP. EPC Contractor ESHS monitoring of its own activities and its subcontractors ESHS performance is referred to as 'self-verification' and forms the first level of ESHS compliance monitoring under this ESMP.

The EPC Contractor is responsible for:

- Self-verification of its own compliance by maintaining a system to manage ESHS aspects and impacts in line with Project Owner's and its own management system requirements;
- Ensuring that all ESHS Non-conformances and incidents are reported and dealt with effectively and that lessons are learned;
- Ensuring their organizations have adequate resources and expertise for ESHS compliance monitoring and control to meet the ESMP requirements;
- Keeping the Project Owner fully informed of any ESHS issues;
- Recording and reporting monitoring observations, required actions and raising non-conformance reports where appropriate;
- Instructing own and subcontractors' staff in their responsibilities with respect to compliance assurance and incident reporting and response;
- Ensure facilitation of any grievances they may receive into the Project Grievance Mechanism

- Cooperating with the Project Owner in relation to ESHS compliance assurance activities;
- Participating in joint inspections, performance reviews and audits as required by the Project Owner;
- Providing Project Owner with access to monitoring records (including all relevant documentation and databases) as required;
- Ensuring adequate expertise, planning and resources are in place to appropriately identify ESHS risks sufficiently in advance of construction, in order to ensure compliance;
- Identifying ESHS risks as part of its planning processes and through implementation of appropriate mitigation measures and communicating these to its workforce;
- Reporting to the Project Owner on ESHS performance, including KPIs on weekly and monthly basis in a commonly agreed format;
- Maintaining updated registers that capture the range of compliance monitoring and assurance information necessary to demonstrate that Project ESHS standards are being met during construction works execution and reporting on this to the Project Owner.

To ensure implementation of the above, the EPC Contractor is required to structure their organization to include sufficient and adequately qualified ESHS staff. The EPC Contractor is responsible for determining the required number of ESHS personnel to ensure that Project ESHS policies, regulations and standards are met throughout works execution.

Furthermore, the EPC Contractor is responsible to ensure that their subcontractors implement throughout their Project activities the requirements set forth in this ESMP and subordinated plans. For this purpose, the EPC Contactor is required to put in place adequate, documented processes for supervision and monitoring of subcontractor responsibilities.

EPC Contractor's ESHS team is to include appropriately qualified personnel covering following roles (individual positions may combine multiple roles as appropriate):

- 1 x ESHS Manager(s) (responsibilities including Environmental, Health and Safety, and Cultural Heritage aspects) (must be EPC employee)
- 1 X Human resource officer (part time)
- 1 x Social officer (must be EPC employee) (part time / shared role)
- 2 x Senior HSE supervisor (must be EPC employee)
- HSE Supervisors (may be EPC or subcontractor employee)[6]
    - Minimum of one HSE officer to 50 persons on site (per subcontractor) (day and nighttime as needed)
    - to ensure permanent presence of one HSE Supervisor on each construction work site (PC site, substations and OHTL) and each shift.

In case, during project execution, the monitoring of EPC Contractor's ESHS performance as performed by the Project Owner indicates insufficient ESHS oversight, compliance assurance resources or practices by the EPC or subcontractors, the Project Owner is entitled to enforce required corrective actions on the EPC Contractor. This may include requiring the EPC Contractor to allocate additional ESHS staff and resources.

6 Subcontractors will have their own on-site E&S staff. Subcontractors with more than ~~20~~ workers shall deploy a dedicated HSE Officer and an additional HSE Officer for each additional 50 workers deployed onsite.

4.0 ESHS MANAGEMENT CONTROLS

4.1 GENERAL APPROACH

ESHS Controls in place during the Project construction stage are based on an ESHS compliance assurance (monitoring and reporting) process to ensure that ESHS Project policies, regulations and standards are met.

Project Owner's management controls ate focused on the following:

i. implementation of the Project's ESHS Management System described in this ESMP,

ii. implementation by the EPC Contractor of the Project Policies, Regulations and Standards,

iii. oversight of EPC Contractor's activities, and

iv. compliance assurance to verify that the works are performed according to the Project Policies, Regulations and Standards and in line with ESHS management system.

This ESHS compliance assurance process (including the full range of environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage aspects) is implemented at two levels:

- First level: EPC Contractor's Self-Verification program (inspections, monitoring, reporting) to demonstrate compliance with ESHS policies, regulations and standards, and to provide evidence that EPC meets their obligations. Includes oversight of subcontractors.
- Second level: Project Owner's Oversight and Assurance activities, including subcontractor management.

Oversight is performed by the Project Owner's ESHS staff to ensure that Project Owner's own and EPC Contractor's activities (including their ESHS self-verification) are aligned with the Project standards and the provisions of this ESMP. This includes review of EPC ESHS reports, documentation, monitoring data, procedures & plans, undertaking formal site inspections and attending meetings with EPC Contractors to drive performance and address issues.

Assurance activities are performed by personnel (or specialized service providers) not directly involved in the works being checked, to provide an additional layer of assurance beyond self-verification and oversight and measure the compliance of Project activities. Assurance process comprises targeted audits and formal reviews. Assurance activities are typically detailed and focused on defined risk areas or guided by feedback from the results of the self-verification and oversight activities.

In addition to the above, independent audits of compliance with Project Requirements, Regulations and Standards and including both Project Owner's and EPC Contractor's performance are performed periodically, typically on annual basis.

The controls put in place to manage, monitor, measure and report compliance with Project ESHS policies, regulations and standards during the Project construction stage are outlined in this ESMP section.

4.2 EPC CONTRACTOR SELF-VERIFICATION PROGRAM [DO]

EPC Contractor is required to operate an Environmental and Social Management System (ESMS) in alignment with the principles of ISO14001 and ISO45001 , which requires self-verification of compliance in accordance with the plan-do-check-review cycle (ESMS accreditation to ISO14001 and ISO45001 , although recommended, is not a requirement).

As part of its construction works planning, EPC Contractor is required to prepare and implement an EPC EHSH Plan and topic-specific Contractor Management Plans (refer to sections 2.5.1 and 2.5.2). These EPC Contractor ESHS management planning documents will detail how the EPC Contractor complies with the specific Project ESHS (including environmental, occupational health and safety, labour and

working conditions, socio-economic, community safety and cultural heritage aspects) policies, regulations and standards through a self-verification program including:

- Performing ESHS inspections and audits of own (EPC) and subcontractors' activities;
- Performing ESHS monitoring;
- Implementation of a non-conformance and incident notification and response procedure;
- Implementation of an EPC Contractor ESHS Action Tracking System.

4.2.1 EPC SUBCONTRACTOR MANAGEMENT (DO)

The EPC Contractor must coordinate, supervise and monitor all its Subcontractors and ensure that safe practices are implemented, and work is conducted safely and in strict compliance with the Project Company ESMP. The EPC Contractor must prepare a Subcontractor Management Plan defining its approach to managing the ESHS performance of their contractor, subcontractors, and other third parties during the various phases of the project. The contractor management approach will be consistent with the general principles described within IFC Good Practice. 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. The EPC must verify the sufficient subcontractor's environmental and social safety management system. Personnel from subcontractors will be treated the same way as those from the EPC Contractor.

The EPC Contractor's management team will be responsible for ensuring sub-contractor performance, including:

Adequately informing sub-contractors of the requirements of the Project ESMP (this document) and the Contractor C-ESMP and ensuring they can adhere to the requirements.

- Making sub-contractors fully aware of all the E&S and occupational health and safety (OHS) and labour rights requirements that must be adhered to through back-to-back provision contract documentation.
- Identifying the procedures for monitoring and reporting sub-contractor performance and integrating this into overall site reporting requirements.

The EPC-ESHS Management Plan must include organization charts for the roles set out above. The EPC Contractor must be able to evidence to the Owner of the subcontractor's ESHS qualification, which must be based on demonstrated capability in ESHS management. Risks and hazards associated with the subcontractor's work must be identified and addressed in the EPC Contractor ESMS.

4.2.2 EPC CONTRACTOR INSPECTIONS AND AUDITS

To provide assurance that the provisions of the topic-specific management plans/method statements are implemented effectively, EPC Contractors are required to implement a program of documented inspections and audits at Project sites and the associated facilities addressing own activities and those performed by subcontractors.

This includes undertaking walk-around inspections during construction works execution to visually monitor that mitigation measures are implemented, undertaking joint inspections with the Project Owner, and engagement with project-affected parties, stakeholders and regulators. These activities will also include, in addition to the ESHS matters, inspection of subcontractors' workforce management aspects (including labour and working conditions and workers accommodation) against Project Requirements, Regulations and Standards with quarterly frequency.

EPC Contractor's internal audits will be performed in line the EPC Contractor`s management system procedures as approved by the Project Owner. As a minimum ESHS internal audits are to be performed by the EPC Contractor on annual basis. Focused audits or performance reviews addressing specific aspects as required in line with the Project stage are to be performed every 6 months. The audits are to be performed by an interdisciplinary team of appropriately qualified health and safety, environmental and social auditors. Project Owner's ESHS staff may join the EPC audit team and participate in the EPC Contractor's internal audits.

4.2.3 EPC CONTRACTOR ACTION TRACKING, NON-CONFORMANCE AND INCIDENT RESPONSE AND NOTIFICATION SYSTEM

In response to any issues, observations, non-conformances and incidents, the EPC Contractor is to propose appropriate corrective actions and record these (including responsibilities and timescale for completion) in its own ESHS (including environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage aspects) Action Tracking System (ATS). The ATS shall be implemented to ensure recording and follow-up of Non-conformances and incidents and their associated corrective actions.

Project Owner's ESHS management staff will regularly review EPC Contractor's ATS, typically on weekly basis, and will follow-up on progress to confirm closure of measures.

A two-tier non-conformances management process has been defined for the St. George Solar PV Project (refer to section 4.4) following a risk-based approach in line with the Project Owner's Non-Conformance Management Procedure. Non-conformances identified as result of inspections, monitoring and audits performed are recorded by EPC Contractor as actions to be addressed in line with their own management systems and reported to Project Owner in the monthly reports as a minimum.

EPC Contractor is required to implement their own ESHS Non-conformances and Incident Reporting and Investigation procedures. All ESHS incidents and near misses will be notified to the Project Owner. Incidents will be notified immediately as they occur, while near misses will be reported on weekly basis.

The Project Owner reserves the right to carry out its own investigations of EPC accidents/incidents/near-misses/non-conformances or assist the EPC investigation teams.

Project Owner's ESHS Manager will review the Non-conformances and incidents reports of the EPC Contractor. Project Owner's ESHS Manager will regularly meet relevant EPC Contractor representatives to review the Action Tracking System and status of actions progress and closure.

4.2.4 EPC CONTRACTOR MONITORING AND REPORTING

The procedures for monitoring implementation and outcomes of the ESHS mitigation measures, ESHS KPIs and environmental and social monitoring are defined by the EPC Contractor in their CMPs and method statements. The monitoring frequencies, parameters, methodology and duration are determined based upon the site activities requiring monitoring and are assessed on a case-by-case basis dependent upon construction activity type and location. The EPC Contractor is responsible for reporting monitoring results to the Project Owner on monthly basis.

4.3 PROJECT OWNER'S ESHS OVERSIGHT AND ASSURANCE PROGRAM

4.3.1 PROJECT OWNER'S ESHS OVERSIGHT (MONITORING) [DO]

ESHS oversight is aimed at monitoring construction activities to determine whether environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage mitigation measures implemented by EPC Contractors are effective (i.e. whether these avoid, minimise the impacts as intended, or whether work practices require revision).

During construction stage, ESHS oversight monitoring is coordinated by the Project Owners ESHS Manager and performed through ongoing review and follow-up on EPC Contractor's weekly and monthly reports and on non-conformance/incident reporting, as well as through inspections of the construction worksites.

The ESHS oversight inspections are performed regularly, on monthly basis, and are intended to highlight key EPC Contractor conformance aspects, and their outcome is used to determine the required actions. In addition to the regular monthly inspections, unscheduled inspections (spot-checks) of critical/key Project areas are performed as needed. The locations and timing of the unscheduled inspections are determined based on the ongoing Project activities and issues, as informed by the EPC Contractor's weekly/monthly reports and the non-conformance/incident reporting outcomes.

The ESHS oversight is aimed at addressing all Project ESHS aspects and worksites and ensuring that each of them are visited by the Project Owner's ESHS management site weekly as a minimum or more often as needed in response to ongoing issues and ESHS management needs.

Checklists may be used in support of the field inspections which may be organized based on specific ESHS topics addressing key aspects associated with the construction works being inspected.

Inspections observations and findings are discussed with EPC ESHS representatives to determine and agree on any actions required.

Project Owner's ESHS oversight (monitoring) reports are generated as simple records to include:

- indication of the construction works/site inspected;
- indication of the construction activities inspected;
- observation notes providing description of positive aspects, good practice or issues/non-compliances identified;
- photographic evidence of the observations made/issues identified.

Where ESHS oversight (monitoring) inspections identify issues or Non-conformances, the remedial actions required in response are discussed and agreed with the EPC Contractor and recorded into the EPC Contractor's ATS.

4.3.2 PROJECT OWNER'S REGULAR ESHS OVERSIGHT REPORTING [DO]

A brief ESHS oversight report is provided by the ESHS Manager to the Project Management on monthly basis. The report summarizes the key issues and challenges during the reporting period as resulted from the ESHS oversight inspections and the review of the EPC Contractors' ESHS reports and ATS status.

Regular reporting is intended to keep the Project Management informed on ESHS aspects, so that direction and feedback can be provided to EPC Contractors and leadership support obtained for addressing key and more strategic issues at appropriate decision levels as applicable.

4.3.3 PROJECT OWNER'S SOLUTIONS ESHS ASSURANCE AUDITS [CHECK]

Environmental, social, health and safety audits of the EPC Contractor are performed on annual basis or upon attaining specific construction works delivery milestones by the EPC Contractor (e.g. 0 – 50%, 50-100% construction works execution).

The ESHS Assurance Audits are conducted primarily by Project Owner's own staff independent of the activities audited, or by contracted third-party specialists to provide assurance of oversight and self-verification activities.

The EPC Contractors are formally notified about the ESHS audits and their scope which include but may not be limited to:

- EPC Contractor ESHS organization/staffing adequacy;
- EPC Contractor ESHS documentation;
- Implementation by EPC Contractor of the ESMP and CMPs, method statements and specific ESHS Procedures;
- ESHS training and inductions;
- ESHS Key Performance Indicators (KPIs);
- ESHS Non-conformance and incident reporting, tracking and closure.

Audit protocols are developed based on the defined scope and used by auditors for guidance and for recording audit observations including good practice and non-conformances.

Audit outcomes are summarized in reports and formally communicated to and discussed with the EPC Contractor. Any required corrective actions are agreed with the EPC Contractor and recorded in their ATS and/or Non-conformance Reporting system as appropriate. Progress in addressing the audit findings is followed up on a regular basis to close the open and pending actions and reported monthly.

4.3.4 KEY PERFORMANCE INDICATORS (KPI) [CHECK]

The Project Owner and the EPC Contractor will track and monitor various performance indicators both leading and lagging so as to identify potential trends in environmental, safety and social performance, as defined in the topic-specific management plans. These are defined in section 4.5 (reporting) below.

4.4 INCIDENT AND NON-CONFORMANCES REPORTING, INVESTIGATION AND CORRECTIVE ACTIONS [ACT]

Non-conformances and incidents are recorded, reported, investigated and addressed.

All non-conformances and incidents (including near misses) will be investigated to establish the immediate and underlying/root causes (plans must be established to deal with immediate risks following unforeseen events) and to identify actions to:

- Evaluate and correct the situation as quickly as possible;
- Assess and limit adverse ESHS consequences of the incident;
- Prevent reoccurrence and improve ESHS performance; and
- Ensure planned actions integrate with other ESHS requirements, including contractor interfaces where appropriate;
- Improve future risk management;
- Ensure lessons are learned throughout the Project organization;
- Demonstrate commitment to effective ESHS management.

Non-conformances are unapproved deviations from Project ESHS Specifications or Standards or deviations from Project Owner's or EPC Contractor's Management Plans. These are typically identified through the oversight and assurance process (e.g. daily monitoring, oversight inspections and audits).

Non-conformities may be categorised as minor or major and are recorded and reported in a pre-defined format including description of source/cause, categorization (severity), description and evidence, responsible party and corrective actions.

Non-conformances are recorded in a register maintained by the EPC Contractor and acting as a tool for following up on non-conformances to closure.

Incidents are classified using a 3-level severity scale (i.e. Minor, Serious, Major). All incidents and accidents taking place on contractor's locations and/or facilities, while under contract with the Project Owner will be reported to the Project Owner's management by e-mail within 12 hours from incident occurrence. In addition, immediate telephone notification will be made for severity 2 and 3 incidents.

All incident investigations are conducted and documented to appropriate level of detail dependent upon the severity of the incident.

Actions identified as being required in the incident investigation report are recorded on Corrective Action Forms to prevent reoccurrence of similar incident. Action plans for the remedial measures implementation as identified in the investigation are defined and include information on responsibilities, resources required, completion dates and reporting requirements.

The status of corrective actions and associated action plans are tracked and once all the actions are completed, this is recorded in a Corrective Action Form signed off for closure. The status of corrective actions implementation and closure is tracked in the Project Incident Register.

Incident reports and key incident statistics are analysed for trends for each Project activity and reported on a monthly basis as part of the performance monitoring program. Relevant findings are communicated throughout the Project organization.

Arrangements for incident reporting and investigation system, as well as the effectiveness of corrective actions are periodically reviewed, as a minimum with annual frequency, as part of the management review process.

4.5 ESHS REPORTING

The following reporting activities are required to be performed:

- Daily reporting (incidents, non-compliances) - EPC Contractor
- E&S weekly reports - EPC Contractor0
- E&S monthly reports - EPC contractor (Format is provided in Attachment 3.
- E&S completion report (at the end of the construction phase) – EPC Contractor
- Quarterly ES Monitoring report (ESMR) (submitted to lenders) – Project Company (construction)
- E&S monthly report - Project Company (construction)
- Annual ESMR – Project Company (operation)
- Annual E&S report (for public disclosure) (operation)
- E&S incident and deviation management report

Further information on the parameters required to be reported are shown in Table 4.1.

Table 4.1: Reporting requirements

Monitoring	Parameters	Frequency & Duration	Location	Reporting obligations	Responsibility
Meteorology	Wind speed (during crane/lifting operations only), temperature, rainfall.	Continuous	Site	Daily summary	EPC Contractor
Biodiversity	Monitoring of biological diversity (all target species) both within the PV territory and in the surrounding territories, including in the nearby protected area BG0000169 Lud Post-commissioning monitoring should be carried out in the first year for an entire field season and include all target groups established in the preliminary studies carried out in 2023, and a report on the monitoring should be submitted (as well as interim reports for the periods: January-February, March-June, July-August, September-December) and, if necessary, to propose new measures or make changes to the initially proposed ones. In the event	Quarterly	Site	Construction and 1st year operation	Project Company
OHS and environmental and social statistics (including COVID-19 statistics)	Numbers of fatalities, accidents and injuries and near misses. Incident reporting and follow-up actions. Daily H&S inspections by qualified personnel. Construction and operations auditing, inspection and reporting schedule. Reviews of incident and accident reporting, drill reporting and any corrective actions identified, where relevant.	Monthly	Site	Monthly construction report. (Noted: the EPC contract defines immediate reporting obligations for a fatality or serious E&S incident)	EPC Contractor
Pollution control	- Number of reported spills (zero or downward trend to be maintained) - Number of reported incidents of concrete washout in undesignated area (zero) - Water quality monitoring in S-L Protected Area (Owner)	Monthly	Site		EPC Contractor

Monitoring	Parameters	Frequency & Duration	Location	Reporting obligations	Responsibility
Waste	- Weekly and monthly waste generation volumes for construction wastes (segregated by waste stream) - Operational waste streams - Waste contracts with authorised waste disposal facilities - Monthly volume of waste generated (per type)	Monthly	Site	Monthly construction monitoring report	EPC Contractor
Resource Use	- Volume of construction water tankered to site. - Volume of potable water delivered to site. - No unauthorised release of contaminated or potentially contaminated water to ABIS canal or ground (zero)	Monthly	Site	Monthly construction monitoring report.	EPC Contractor
Environment	Dust episodes, soiling of vegetation, dust resuspension on the roads and dust clouds at work fronts	2 x Daily (visual)	Site	Daily inspection checksheet and action requirement	EPC Contractor
Cultural heritage	- Log and report all chance finds identified. - Should items of cultural heritage be found on or near the Project site, these should be regularly monitored to ensure they are properly signposted, their buffer zones are maintained and that no harm has come to the items.	As relevant	Site	Monthly	EPC Contractor
Labour and worker grievance statistics	Number of workers, gender of workers and if they are local or not and subcontractor statistics.	Weekly	Site	Monthly construction monitoring report	EPC Contractor
Labour accommodation	- Compliance of accommodation against the labour accommodation policy (Silistra and if necessary further afield).	Monthly	Labour accommodation	One time accommodation audit report (per accommodation) . (monthly construction monitoring report or accommodation audit report only if non-compliance risk is high or non-compliance or grievance is raised)	EPC Contractor

Monitoring	Parameters	Frequency & Duration	Location	Reporting obligations	Responsibility
Labour and working conditions	Review of working conditions, paysheets and payslips, leave allocation, and interview with workers to verify findings.	Monthly	Site	Monthly construction monitoring report or labour audit report	EPC Contractor / Working Conditions Committee
Security incidents	Security incidence. Incident reporting and follow-up actions.	Monthly	Site	Monthly construction monitoring report	EPC Contractor
Worker Grievances	- Number of worker grievances received (grievance log).	Monthly	Site	Monthly construction monitoring report (worker grievances)	EPC Contractor
Community Grievances	- Number of community grievances (open, closed) - Responses and follow-up actions (e.g. conduct noise monitoring in the event of a noise complaint or evidence of exceedance of community noise guidelines values).	Monthly	Local communities	Monthly construction monitoring report (community grievances)	Owner

4.6 EXTERNAL REPORTING [ACT]

The Project Owner will prepare an annual report on environmental; health and safety performance and implementation of the stakeholder engagement plans and grievance procedure. The annual report will be disclosed on the Project website.

In addition, the Project Owner commits to following external reporting:

- Statutory Notifications and Reporting to national regulatory bodies as required in line with the applicable regulations and Project permits,
- Community engagement and grievances; and
- Incident Notification and Reporting.

According to the incident reporting procedure in place, medium and major incidents (fatalities included) are to be reported to authorities within 2 hours from occurrence. Any such incidents will be also reported to St. George Solar PV Project lenders within 12 hours[7].

All environmental and social incidents will be appropriately documented, notified and reported in accordance with established procedures as indicated in previous sections of this ESMP.

Incident notification and reporting to relevant national regulatory bodies will be performed in line with applicable regulations in force and as stipulated in permits and licenses.

7 Note: to be confirmed based on CTA

5.0 MANAGEMENT OF CHANGE [DO]

The process in place to manage changes impacting ESHS aspects of the Project are integrated in the overall change management process applicable to all Project Changes.

ESHS changes addressed in this ESMP section include:

- new planned activities or processes and or changes in project activities, design or footprint leading to potential impacts that were not subject to assessment as part of the Project ESIA package;
- changes to ESHS management, mitigation and monitoring commitments not considered in the Project ESIA package;
- changes/updates of legal and regulatory requirements, technical codes and business objectives that may trigger potential impacts that were not subject to assessment as part of the Project ESIA.

Triggers for consideration in relation to changes specified above may include:

- Design refinement or detailed design outcomes
- Changes in construction methodologies;
- Field obstacles during construction;
- Results of further field surveys and monitoring;
- Comments/concerns submitted by public/stakeholders/lenders;
- Changes in regulations or requirements by regulatory bodies.

The Management of Change provides for a simple ESHS management of change process, as represented in Figure 8 below.

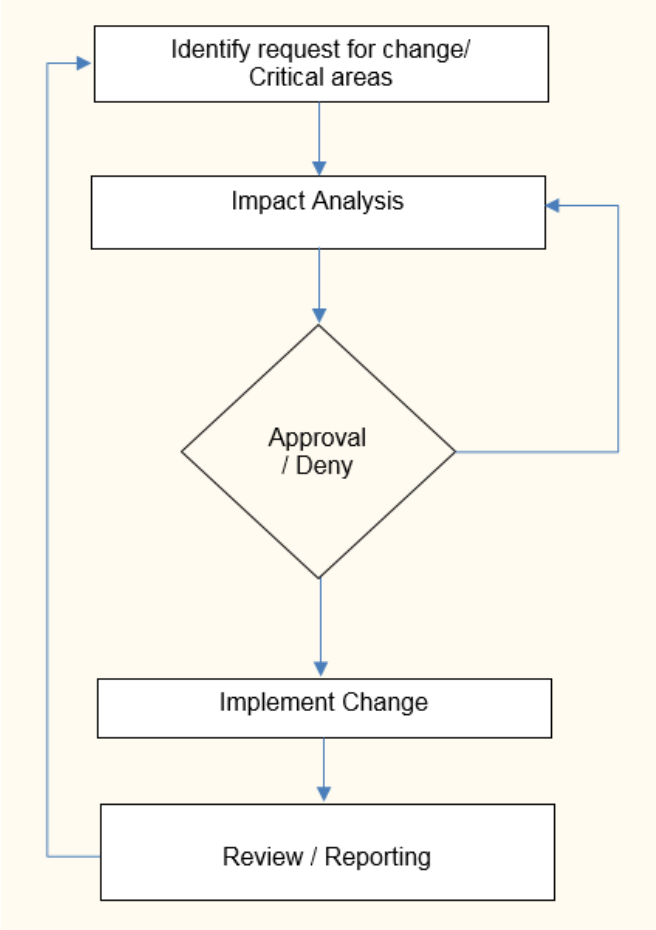

Figure 8: ESHS Change Management Process

The ESHS change management process is managed by the ESHS Manager and comprises the following main steps.

Change Identification

ESHS changes are identified various ways, including requests by the EPC, engineering, construction teams and are summarised in a Management of Change Form.

Change Impact Analysis and Notification of Changes

Upon receiving the Management of Change Form, the EHS Manager with the support of the ESHS Specialist undertakes performs:

- An assessment of proposed change risks
- A screening review of any proposed changes that have the potential to give rise to new or additional significant impacts (positive or negative) which differ to those identified as part of the ESIA Package.

The screening will be performed by/under the direction of the ESHS Manager with involvement, as warranted, of other Project Owner staff and EPC Contractor Environmental Expert/Design Team, and/or with support from external specialized consultants. To assist with the review, a Change Screening Matrix will be used.

The potential outcomes of the Changes Screening can be grouped in 3 tiers in relation to environmental and social impacts (in line with the corresponding definitions in the ESIA package) as follows:

- Tier 1 Changes – Changes where the potential impact of the change prior to mitigation will be no more than minor.
- Tier 2 Changes – Changes where the potential impact of the change prior to mitigation will be moderate.
- Tier 3 Changes – Change were the potential impact of the change prior to mitigation will be major.

Tier 1 Changes will be implemented by the Project Owner without notifying the St. George Solar PV Project lenders.

For Tier 2 Changes, Project Owner will inform the Project Lenders of the change, but will not have to secure their approval prior to implementing the change.

For Tier 3 Changes, Project Owner will seek approval from the Project Lenders prior to implementing the change.

The following changes will be considered as Tier 3 Changes:

- Changes to the Project design and footprint or activity that may result in a potential new major impact, or elevate an impact already assessed to a potential major impact.
- Changes in commitments to mitigate or avoid potential impacts that may result in a potential new major impact.

6.0 ESHS TRAINING [DO]

6.1 OBJECTIVES

The Project Owner is committed to ensure that ESHS training is delivered to all staff as required for delivering their roles. In the frame of the recruitment process, Project staff is verified for competency and experience. Following employment with the Project, the staff receive adequate induction and ongoing ESHS training according to a training plan.

The aim of the induction training is to make Project staff aware of the actual or potential actual or potential ESHS risks associated with their work activities, their behaviour, and of the potential consequences of departure from the Project ESHS procedures.

In addition to the induction, the new Project staff will further undertake specific ESHS training commensurate with their roles. Employed training process shall take into account different levels of responsibility, ability, language skills, and risks associated with each position.

A system for evaluating the effectiveness of the training or action taken will be implemented. Training records will be documented and held on file.

EPC Contractor and service providers are contractually bound to implement specified ESHS training requirements.

6.2 EPC OBLIGATIONS

The EPC Contractor's ESHS training and competency requirements are contractually specified.

EPC Contractor shall ensure that all construction employees (own and subcontractor staff) are adequately qualified and have the ESHS knowledge and skills required for the execution of their work duties.

Prior to the commencement of the work, EPC Contractor shall submit a Training Plan identifying specific training requirements against each job title for review and acceptance by the Project Owner.

The Training Plan is to be based on an analysis of training requirements and should comprise:

- an induction training program to be delivered to all personnel (own and subcontractor staff), vendor representatives and site visitors;
- general and job/task-specific training as needed for the performance of the duties to which the person (own and subcontractor staff) is assigned to.

The Training Plan will include a Competency/ Training Matrix. The Competency/ Training Matrix is to be developed as a tool documenting and comparing the required competencies for a position with the existing skill level of the employees performing the roles and shall be used to determine the training needs. The Competency/ Training Matrix is also to be used as a tool for managing people development.

The Training Plan and the Competency/ Training Matrix are to provide the mechanism to ensure that training is timely delivered, and the training program is effective. For this purpose, the EPC Contractor is to perform regular evaluations throughout the construction works period to ensure that the Training Plan has achieved its objectives i.e. that all staff (own and subcontractor employees) are suitably qualified, competent and fit for their job duties. The frequency and timing of such evaluations is to be determined by the EPC Contractor and subject to Project Owner's approval.

Implementation of ESHS training requirements will be reviewed by the Project Owner throughout the contract period according to the provisions of this ESMP.

7.0 MANAGEMENT REVIEW [CHECK]

Management Review is a key element of the ESMP Cycle (Figure 1), closing the adaptive management loop as part of the continual improvement process of the implemented management system.

Project Owner's and EPC Contractor's management reviews are undertaken at several levels of the organization and include the following:

- Project Owner performance reviews.
- EPC Contractor's ESHS functional and project cross-functional reviews.
- Project management meetings.
- Weekly and monthly ESHS function meetings.

Project Owner's senior management periodically review the overall effectiveness of the ESHS management system, annually as a minimum. The scope of the ESHS Management Review include:

- Provide management with a summary of yearly ESHS performance, including:
    - Non-conformances and corrective actions
    - Monitoring and measurement results
    - Audit results
    - Stakeholder feedback and concerns (as resulting from the stakeholder engagement process)
    - Adequacy of ESHS resources
    - ESHS performance
    - ESHS incident trends, response, and reporting.
- Identify opportunities for and drive continual improvement.
- Summarize the significant ESHS risks and envisaged risk management in the following period.

The annual ESHS Management Review will inform the annual ESHS planning and targets as well as any changes including resource needs.

ATTACHMENT 1: RELEVANT LAWS AND REGULATIONS

Topic Covered	Legislation	Legislation Number and Date	Relevance to Project
Accidents and Emergencies	Ordinance on ascertaining, investigation, registration and reporting of the occupational accidents	SG No6 of 21.1.2000, SG No28 of 4.4.2017	This ordinance regulates the procedure of ascertaining, investigation, registration and reporting of the occupational accidents.
Archaeology / Cultural Heritage	Ordinance № 5/14.05.1998 for designation of immobile cultural and historical items as cultural monuments	SG № 60 of 27/05/1998 SG № 20 of 06/03/2001	This ordinance covers the procedure for designation of the immobile cultural and historical items as cultural monuments.
	Ordinance to implement the terrain archaeological surveys	SG № 18 of 01/03/2011	This ordinance covers the exploration of archaeological items.
	Guide to implement the terrain archaeological surveys	SG № 12 of 07/02/1997	This ordinance covers the exploration of archaeological items.
Biological Impact	Environment Protection Act	2004/35/EC SG № 91/25 of 09/2012 SG № 38 of 18/05/2012	This Act makes provision for: 1. Obtaining and furnishing information concerning the state of the environment; 2. The control of the state of the environment; 3. The assessment of the impact on the environment; 4. The planning and implementation of environmental protection activities; and 5. The rights and duties of central and local authorities, bodies corporate and physical persons as regards environmental protection.
	Biodiversity Act	SG № 77 of 2002 SG № 32 2002 of 24/04/2012	The articles of relevance are: Article 2 1. Conservation of natural habitat types of representatives of the Republic of Bulgaria and of Europe and habitats of endangered, rare and endemic plant, animal, and fungal species within a National Ecological Network; 2. Conservation of the protected plant, animal, and fungal species of the flora, fauna, and mycota of the Republic of Bulgaria, as well as of those subject to use and trade; and 6. Conservation of centuries-old and remarkable trees. Article 3 Development a National Ecological Network which shall comprehend: 1. Special Areas of conservation part of the European Ecological Network NATURA 2000, which may incorporate protected areas; 2. Protected areas outside Special Areas of conservation; (2) In the National Ecological Network priority will be included CORINE sites, Ramsar sites, Important Plant Areas and Important Bird Areas. Art. 37. Species from Appendix 3 are protected in all Bulgaria. Art. 38 prohibitions for capture, killing or any kind of breaching of species included in Appendix 3. Art. 48 Exceptions to the prohibitions for species in Annex № 3. Art. 49

			Written permission from the Minister of the Ministry of Environment and Water for exceptions. Art. 51 Terms and conditions for issuing permits under Art. 49 is determined by an Regulation approved by the Minister of Environment and Water and Minister of Agriculture and Food.
	Ordinance № 8 for terms and conditions for issuing permits for exemptions from the prohibitions introduced by the Biodiversity Act for animal and plant species listed in Appendix № 3, the species of Appendix № 4 for all bird species outside the Appendix № 3 and № 4 and indiscriminate use of appliances, tools and methods of capture and killing of Annex № 5	№ 4 of 16/01/2004	This ordinance sets the terms of conditions for issuing permits under Art. 49 of the Biodiversity Act.
	Directive on the conservation of natural habitats and of wild fauna and flora Directive on the conservation of wild birds - Ordinance № 5 on the conditions and order for the elaboration of action plans for animal and plant species	92/43/EEC 79/409/EEC SG № 73 of 19/08/2003	The ordinance regulates the terms and conditions for the development of action plans for animal and plant species, species population status, its priority habitats, threats and limiting factors and regime of their protection.
	Directive on the conservation of natural habitats and of wild fauna and flora - Ordinance for Assessment of plans and projects that will significantly affect Natura 2000 sites	92/43/EEC SG № 73 of 11/09/2007 SG № 3 of 11/01/2011	This directive covers the conditions and procedures for assessment of the compliance of plans, programmes, projects and investment proposals with the subject and aims of protected zones preservation.
	Forestry Act	SG № 19 of 08/05/2011 SG № 38 of 18/05/2012	This Act regulates the ownership and the management of forests in Bulgaria with the aim to ensure the sustainable management of Bulgarian forests and forest resources. It applies to all forests, as well as the lands included in the national forest fund, regardless of their property status. Forest within protected areas is also regulated by the Protected Territories Acts and the Biodiversity Act.
	Rules for implementation of the Forestry Act, adopted by Decree № 80 of 1998	SG № 41 of 10/04/998 SG № 7 of 21/01/2011	Relevant articles are: Art. 1. The rules set conditions and order for management, reproduction, use and protection of forests and forest lands, and relationships associated with ownership of them.
	Directive on the conservation of natural habitats and of wild fauna and flora and Directive on the conservation of wild birds - Protected Areas Act	92/43/EEC 79/409/EEC SG № 133 of 11/11/1998 SG № 19 of 08/03/2011	The purpose of this Act is to conserve and preserve protected areas as a national and human wealth asset and as a special form of conservation of Bulgarian nature, conducive to the advancement of culture and science and to public welfare.
	Ordinance on developing protected areas management plans	SG № 13 of 15/02/2000	Under Article 3: (1) A management plan shall regulate the activities in the respective protected area within the boundaries delimited by the designation order

			of the said area; and (2) Biotic and abiotic features and anthropogenic factors within areas adjoining the protected area may be subject to investigation where: 1. The protected area is part of a habitat of European importance, or a habitat included in lists under international conventions in the sphere of biodiversity; 2. A need is ascertained to clarify the impact of the said features and factors on the protected area; and 3. This is expressly indicated in terms of reference endorsed according to the procedure established by this Regulation. (3) The information, conclusions and assessments in the cases covered under Paragraph (2) shall be indicated in the plan under separate items.
EIA	Environment Protection Act	85/337/EEC, amended by 97/11/EC, amended and supplemented by Directive 2003/35/EC SG № 91/25 of 09/2002 SG № 38 of 18/05/2012	
	Ordinance on the conditions and order of conducting EIA including environmental impact assessment in transboundary aspect	85/337/EEC, amended by 97/11/EC, amended and supplemented by Directive 2003/35/EC SG № 87 of 23/03/1995 SG № 3 of 11/01/2011	This legislation relates to: 1. Assessment of the need for making an EIA; 2. Terms and procedure for consultations. Determination of the scope, the contents and the form of the EIA report; 3. Organisation of public discussion on the EIA report.
Health Impacts	Health Act	SG № 7004 SG № 40 of 29/05/2012	This act regulates public relations connected with the health of citizens (including the affected by the project).
	Healthy and Safety at Work Act	SG № 124 of 23/12/1997 SG № 7 of 24/01/2012	The articles of interest are: Art. 25 paragraph 1 the employers shall provide services to employees of registered occupational medicine. Art. 25 paragraph 1 the employers shall provide services to employees of registered occupational medicine. Art. 25a paragraph 1 the main activities of the occupational health services are: 1. Assistance to employers to create an organization for health and safety at work; 2. Assessment of professional risks and analysis of health conditions of the workers; 3. Proposing measures to eliminate and reduce the risk; 4. Health monitoring of workers; and 5. Training of employees and officials on the rules for health and safety at work.
	Ordinance № 2/22.03.2004 on the minimum requirement for health and safety in carrying out construction works	№ 2 (SG № 37 of 22/03/2004)	This ordinance covers the health requirements for carrying out construction work, ensuring healthy and safe working conditions and environmental protection.

	Ordinance № 5 on the order, manner and frequency of risk assessment	№ 5 (SG № 47 of 1999)	This ordinance shall regulate the procedure, manner and frequency of risk assessment for health and safety of employees.
	Ordinance № 36 for the conditions for the exercise of public health control	№ 36 (SG № 63 of 07/08/2009 and SG № 38 of 17/05/2011)	This ordinance covers the conditions and procedures for the exercise of public health control subjects of public importance; products and goods of importance to human health; the activities of importance to human health; the factors of environment. Article 19 Para 1 The regional health inspections assess compliance with health requirements of investment projects and project at the request of physical or legal persons and elaborated health conclusion. Article. 20. Para. 1 State health inspectors from Regional Health Inspectorate will participate in the state acceptance committee for commissioning of constructions from the first, second and third category.
	Ordinance № 3 for minimum safety and health of workers using personal protective equipment at work	№ 3 (SG № 46 of 2001)	This ordinance covers the specifies the minimum safety and health of workers using personal protective equipment at work.
	Ordinance № 3/14.05.1996 on instructing the employees on safety, hygiene and fire protection at work	MNE (2006) 56047 SG № 44 of 01/07/1996	The ordinance regulates the instructing of the employees on safety, hygiene and fire protection at work.
	Ordinance № 14/7.08.1998 on the occupational health services	MNE (2006) 56049 SG № 95 of 14/08/1998	This ordinance sets rules for the internal organisation, tasks and functions of the state labour medicine services.
	Ordinance № 15/31.05.1999 on the arrangements and requirements for development and implementation of physiological modes of work and recreation	MNE (2006) 56378 SG № 54 of 19/06/1999	The ordinance describes the arrangements for schedule of work and rest during the working day in order to reduce the tiredness and to keep good health.
	Ordinance № 3/28.02.1987 on the obligatory preliminary and periodic medical examinations of the workers	SG № 16 of 27/02/1987 SG № 78 of 30/09/2005	Organisation of the obligatory preliminary and periodic medical examinations of the workers.
Land Impacts	Spatial Planning Act	SG № 1/02 SG № 87 of 02/01/2001 SG № 3 of 18/05/2012	Chapters of importance are: Ch. 2 Purpose of Territories and Landed Property; Ch. 3 Arrangement of Territories and Landed Property; Ch. 4 Technical Infrastructure's Net and Facilities; Ch. 5 Arrangement schemes; Ch. 6 Arrangement plans; Ch. 8 Investment design and permission of construction; Ch. 9 Beginning of the construction works and relationship "Who is Who" in the construction process; Ch. 10 Design and Construction Insurance; Ch. 11 Completion of the construction works. Usage Permission; and Ch. 13 Temporary roads. Crossing of third-party land ownership and right of way Removing existing constructions.
	Regulation № 16/9.06.2004 on the Energy Sites Servitudes (SG №	SG № 88 of 08/10/2004 SG № 77 of 02/09/2008	Articles of interest are: Art. 14 - Minimal margins (dimensions) of easement zones for energy

	88/2004, last amended, SG № 77/2.09.2008);		sites for storage, transmission, distribution or transformation of natural gas.
	Soil Act	2004/35/CE SG № 89 of 06/11/2007 SG № 98 of 14/12/2010	Under Article 2; this act discusses: 1. Prevention of soil deterioration and the damages; 2. Conservation of the soil;
	Agricultural Land Conservation Act	2004/35/CE SG № 35 of 24/04/1996 SG № 39 of 20/05/2011	Under Chapter 2 and 4, this act discusses: 1. Protection of the agricultural lands against damages; and 2. Reinstatement of lands.
	Ordinance № 3 on the limit values of hazardous substances in the soil	№ 3 (SG № 71 of 12/08/2008)	The norms for the permissible limits of harmful substances in the soils are determined on the basis of the risk assessment for the environment and the human health at three levels: 1. Low assessment concentrations; 2. Maximal permissible concentrations; and 3. Interventional concentrations.
	Ordinance № 26/2.10.1996 on environmental liability with regard to the prevention and remedying of environmental damage	2004/35/CE SG № 89 of 22/10/1996 SG № 30 of 22/03/2002	This ordinance covers: 1. Reinstatement of damaged terrains; 2. Stripping, storage and utilization of the humus layer; and 3. Terrains for reinstatement, humus utilization and sites for humus depose.
Labour and Working Environment	Ordinance on working time, rest and leave	SG № 6 of 23/01/1987 SG № 19 of 06/03/2012	Description of requirements relating working time, rest and leave.
	Ordinance № 7 on the minimal requirements for health and safety of the working sites and in usage of working equipment	SG № 88 of 08/10/1999	Under section 3, 7 and 9, articles of importance are: 1. Workshops, other production building and working sites; 2. Working environment, Dust, toxic and other substances; and 3. Providing of PPE and clothing gear.
	Labour Code	SG № 26 of 01/04/1986 SG № 49 of 29/06/2012	Chapter 13: Health and Safety at Work regulates: 1. Obligations of the employer in order to ensure health and safety at work so that any risk for the workers could be eliminated; 2. Obligation of the employer to provide sanitary, welfare and medical services; 3. Special work clothes and PPE; 4. Limited Duration of work in harmful or hazardous environment; 5. Periodical medical examinations; and 6. Prevention and reporting of injuries and diseases.
	Ordinance on the essential requirements and conformity assessment of electrical equipment designed for use within certain voltage limits	MNE (2007) 55758 SG № 37 of 08/05/2007	The ordinance sets essential requirements and describe the conformity assessment of electrical equipment designed for use within certain voltage limits.
	Ordinance № 4/2.08.1995 on the signs and signals of work safety and fire protection	MNE (2006) 55016 SG № 77 of 01/01/1996	This ordinance describes the signs and signals of work safety and fire protection.

	Ordinance № 3/27.07.1998 on the functions and tasks of officials and of the specialised authorities at enterprises for organising the implementation of activities relating to the protection and prevention of occupational risks	SG № 91 of 09/08/1998 SG № 102 of 22/12/2009	The ordinance shall regulate the functions and tasks of officials and of the specialised authorities at enterprises.
	Ordinance № 16/31.05.1999 on the Physiological Standards and Rules for Manual Handling of Loads	SG № 54 of 15/06/1999 SG № 70 of 26/08/2005	The ordinance sets the physiological norms and rules for manual handling of loads and the responsibilities of employers and employees.
	Ordinance № 13/30.12.2003 the Protection of the Health and Safety of Workers from the Risks Related to Chemical Agents at Work	SG № 8 of 30/01/2004 SG № 2 of 06/01/2012	Requirements on the protection of the Health and Safety of Workers from the Risks Related to Chemical Agents at Work.
	Ordinance № 5/20.04.2006 to ensure the health and safety of workers in limited employment relationship or in temporary employment relationship	MNE (2006) 56199 SG № 43 of 26/05/2006	The ordinance requires health and safety of workers in limited employment relationship or in temporary employment relationship.
	Ordinance № 3/25.01.2008 on the minimum health and safety requirements regarding the exposure of workers to the risks arising from vibration	MNE (2007) 51246 SG № 40 of 06/07/2005	The ordinance sets minimum health and safety requirements regarding the exposure of workers to the risks arising from vibration.
	Ordinance № RD-07/8 of 20.12.2008 on minimum requirements for signs and signals for safety and/or health at work	SG № 3 of 13/01/2009	This ordinance sets the minimum requirements for signs and signals of work safety and fire protection.
Impacts on Atmosphere	Clean Air Act	2008/50/EC SG № 45 of 28/05/1996 SG № 38 of 18/05/2012	The basic indices, characterizing the quality of the air in the surface layer of the atmosphere, are the levels of: 1. Suspended particles; 2. Fine dust particles; 3. Carbon dioxide; 4. Lead (aerosol); and 5. Benzene.
	Ordinance № 7/3.05.1999 on Ambient Air Quality Assessment And Management	96/62/EC SG № 45 of 14/05/1999	Part. 3. A combination of measurements and modelling techniques may be used to assess ambient air quality where the levels over a representative period are below a level lower than the limit value, to be determined according to the provisions referred to in Article 4 (5). Part 4. Where the levels are below a level to be determined according to the provisions referred to in Article 4 (5), the sole use of modelling or objective estimation techniques for assessing levels shall be possible. This provision shall not apply to agglomerations in the case of pollutants for which alert thresholds have been fixed according to the provisions referred

		to in Article 4 (5).
Ordinance № 2/19.02.1998 for limited values (concentrations in waste gases) of harmful substances emitted in the ambient air from stationary sources	SG № 51 of 06/05/1998 SG № 19 of 08/03/2011	The ordinance states that the aim is to keep emission values low to prevent or reduce emissions of harmful substances into the air from stationary sources.
Ordinance № 16/12.08.1999 of the emission of volatile organic compounds from storage, loading or unloading and transport of petrol	№ 16 (SG № 75 of 24/08/1999) SG № 33 of 27/04/2012	This Regulation sets the requirements for limited emissions of volatile organic compounds.
Directive of the European Parliament and of the Council relating to the assessment and management of environmental noise - Protection from Environmental Noise Act	2002/49/EC SG № 74 of 13/09/2005 SG № 41 of 02/06/2009	Chapters of importance are: Chapter 2: 1. Previous, current and future noise conditions; 2. Exceedance of the limit values of the noise indicators; 3. Type and location of the items with the regulated noise characteristics; and 4. Number of the population in the area subject to noise impact. Chapter 5: 1. Control on the sources of environmental noise; and 2. Control on the execution of the conditions set in the ESIA permit.
Directive of the European Parliament and of the Council relating to the assessment and management of environmental noise - Ordinance № 6 on noise indicators, limit values of the noise indicators, assessment methods for environmental noise indicators, as well as assessment methods related to the negative impact on human's health	2002/49/EC SG № 58 of 18/07/2006	This ordinance covers: 1. Environmental Noise Indicators; 2. Limit values / norms; and 3. Assessment methods.
Directive on the approximation of the laws of the Member States relating to the noise emission in the environment by equipment for use outdoors - Ordinance on the requirements and the evaluation of the compatibility of the machines and equipment for use outdoors as regards the noise emitted in the ambient air	2000/14/EC SG № 11 of 10/02/2004 SG № 37 of 08/05/2007	This ordinance: 1. Determines the machines and equipment for use outdoors; and 2. Specifies the permissible levels of sound power of machines and equipment for use outdoors.
Ordinance № 6 on the emission standards for permissible levels of harmful and dangerous substances in wastewater discharged in water bodies	2006/11/EC SG № 97 of 28/11/2000 SG № 24 of 23/03/2004	This ordinance sets out the limit Values for Admissible Contents of Dangerous and Harmful Substances in the Wastewater Discharged in the Water Bodies.

Waste

The state policy on waste management is a modern resource efficiency concept aiming to prevent waste, promote reuse through recycling, regeneration or other process of extracting secondary raw materials, provide safe disposal and storage of waste, increase producers' responsibility, stimulate investment in the sector, within the available financial instruments.

The policy on waste management is carried out by the Ministry of Environment and Water, assisted by Directorate Waste management and soil protection, in accordance with EU and national legislation – Environment Protection Act, Waste Management Act, regulations, national planning and strategic documents – National Plan for Waste Management 2014-2020, National Strategic Plan for Urban Wastewater Treatment Plants Sludge Management 2014-2020, National Strategic Plan for Construction and Demolition Waste Management 2011-2020 and National Strategic Plan for Gradual Reduction of Biodegradable Waste.

In the context of European Commission waste policy and the development of circular economy, the linear economic model of the type "get, produce and dispose" no longer corresponds to the needs of modern society and the limited nature of natural resources. According to the accepted hierarchy of waste priority is given to waste prevention, followed by preparation for reuse, recycling, recovery and finally disposal, being the most undesirable option.

In this sense, the state policy on waste management is focused on the integration of new, sustainable from environmental and economic point of view models where everything that can be utilized and recycled from household waste is separated to be transformed into energy, raw material for the industry, fertilizer for the plants and only minimal amounts of waste are disposed at the newly built regional landfills.

By legislative and non-legislative initiatives, the policies of the Ministry are consistent with the policies at European level and the key aspects of the national interest to achieve a 65% recycling of household waste by 2030, 75 % recycling of packaging waste by 2030 and 10% maximum landfill disposal by 2030 as described below

International legislation

EU WASTE FRAMEWORK DIRECTIVE

The Waste Framework Directive (2008/98/EC), and subsequent amendments including Directive 2018/851, provides a comprehensive foundation for the management of waste across the European Community. The objective of the Directive is to improve waste management with a focus on sustainable material management. This should be undertaken with "*a view to protecting, preserving and improving the quality of the environment, protecting human health, ensuring prudent, efficient and rational utilisation of natural resources, promoting the principles of the circular economy, enhancing the use of renewable energy, increasing energy efficiency, reducing the dependence of the Union on imported resources, providing new economic opportunities and contributing to long-term competitiveness*".

The following articles within the Directive are of relevance to the Project within the scope of this chapter:

▪ Article 3 defines waste as: "any substance or object that the holder discards or intends or is required to discard". It is important to note that the definition of 'discard' set out in the Waste Framework Directive includes any substance or object that is discarded for disposal or that has not been subject to acceptable recovery (including recycling); and

▪ Article 4 defines the elements of the Waste Hierarchy (Figure below):

The main principles of the Waste Hierarchy are:

• Prevention: using less material in design and manufacture; keeping products for longer; re

use; using less hazardous materials;

The first option is to prevent the production of waste by choosing, from the design phase, the best technologies. It is not always possible to avoid the production of waste. Measures must be taken to minimize the amount of waste generated. This will be done through: reuse, recycling and energy recovery as well as through the selective collection of waste in order to recover it.

Reducing the amount of waste is also achieved through the efficient use of resources, monitoring the flow of materials used and results, training employees to comply with the legal provisions in the field, establishing a construction waste recycling program and identifying companies specialized in the transport, disposal and waste recycling.

- Preparing for reuse: checking, cleaning, repairing, refurbishing, whole items or spare parts;
- Recycling: turning waste into a new substance or product; includes composting if it meets quality protocols; Measures will be taken to reuse all recyclable waste.
- (Other types of) recovery: anaerobic digestion; incineration with energy recovery; gasification and pyrolysis which produce energy (fuels, heat and power); recovering materials from waste; some backfilling; and The operations will be carried out, the main result of which is the replacement of some materials with recovered waste.
- Disposal: landfill and incineration without energy recovery. Disposal/storage will be the last option chosen when the others have been exhausted.

▪ Article 14 identifies that responsibility for the costs of waste management shall be borne by the producer of the waste;

▪ Article 15 outlines responsibility for waste management. This includes responsibilities for the waste transfer process such as the need to ensure professional waste collection and transport results in delivery to appropriate treatment installations;

- Article 17 sets out measures for the control of hazardous waste. Obligations to ensure the production (i.e. generating), collection and transportation of hazardous waste, as well as its storage and treatment, are carried out in conditions providing protection for the environment and health;
- Article 18 outlines that hazardous waste must not be mixed with non-hazardous waste, with the exception that if a Best Available Technique (BAT) is applied at permitted facilities.

National legislation

Waste Management Act	2006/12/EC SG № 86 of 30/09/2003 SG № 36 of 26/04/2011	This directive: 1. Specifies the base conditions in waste management and determinate the different type of waste; 2. Covers obligations of parties engaged in activities related to waste; and 3. Covers control over the waste management.
Ordinance № 3 on the classification of wastes	2000/532/EC SG № 44 of 25/05/2004	This ordinance covers: 1. Terms for waste classification, including toxic waste; and 2. Registration of each type of waste / obligations of the waste owner.
Ordinance on the packaging and packaging waste	94/62/EC SG № 19 of 09/05/2004 SG № 29 of 08/04/2011	This ordinance covers: 1. Give general information for organizing the separate collection of waste; 2. Specifies the right way for disposal of packaging waste and the necessary requirements for performing of collection, transportation, separation and utilization of packaging waste.
Ordinance on the requirements for production and launch to market of batteries and accumulators, and for treatment and transportation of waste batteries and accumulators	2006/66/EC SG № 58 of 15/07/2005 SG № 29 of 08/04/2011	This ordinance specifies the conditions for storage and handling of used batteries.
Ordinance on the requirements for marketing of electrical and electronic equipment and treatment and transportation of waste electrical and electronic equipment	2002/96/EC SG № 36 of 02/05/2006 SG № 29 of 08/04/2011	This ordinance specifies all conditions and requirements in collection, storage, handling and transportation of waste electrical and electronic equipment.
Ordinance on the treatment and transportation of industrial and other hazardous waste	2008/98/EO SG № 29 of 1999	This ordinance: 1. Determines the general conditions for handling of industrial and hazardous waste; 2. Determines the requirements in collection, adoption and temporary storage of industrial and hazardous waste; and 3. Specifies the conditions in transportation of industrial and hazardous waste, including transport documentation and requirements to the transport vehicle.
Ordinance on the requirements for treatment and transportation of	75/439/EIO & 2008/98/EO SG № 90 of 11 /11/2005 SG	This ordinance: 1. Specifies the prohibition on waste oil disposal to surface and ground

	processed lubricants and waste oil products	№ 29 of 08/04/2011	water and soil; 2. Requires contract to be made with licensed waste oil treatment company, holding valid waste management permit under Waste Management Act; and 3. Specifies the requirements for handling of waste oils - temporary storage facilities and transportation condition and documentation.
Water	Water Act	2008/105/EC SG № 67 of 1999 SG № 80 of 14/10/2011	This law covers the ownership and water management on the territory of the Republic of Bulgaria as a national indivisible natural resource and the ownership of the water economic systems and facilities; summary of the permits: the issued permit regulates water management, usage and protection.
	Ordinance № 13 on the characterization of surface water	2008/105/EC SG № 37 of 08/05/2007 SG № 80 of 14/10/2011	This ordinance covers the characterization of surface water.
Soils	Soil Act	2004/35/CE SG № 89 of 06/11/2007 SG № 98 of 14/12/2010	Under Article 2; this act discusses: 1. Prevention of soil deterioration and the damages; 2. Conservation of the soil;
	Ordinance № 3 on the limit values of hazardous substances in the soil	№ 3 (SG № 71 of 12/08/2008)	The norms for the permissible limits of harmful substances in the soils are determined on the basis of the risk assessment for the environment and the human health at three levels (presented in the impact assessment chapter): 1. Low assessment concentrations; 2. Maximal permissible concentrations; and 3. Interventional concentrations.
Noise	The Noise Level Guidelines (IFC, WHO) refer to noise originating from facilities as well as stationary noise sources and are commonly applied as design standards for industrial and infrastructure facilities. <u>National Legislation:</u> • Ordinance No. 6 of 26.06.2006 on the environmental noise indicators, considering the degree of discomfort during the different parts of the day, the limit values of the environmental noise indicators, the assessment methods of the noise indicator`s values and the harmful effects of noise on public health, Issued by the Minister of Health and the Minister of Environment and Water, prom. SG 58 of 18.07.2006 • Ordinance No. 54 of 13.12.2010 on		

the activities of the national system for environmental noise monitoring and on the requirements for conducting self-monitoring and provision of information from industrial sources of environmental noise, Issued by the Minister of Health and the Minister of Environment and Water, prom. SG 3 of 11.01.2011, entering into force on 12.02.2011

IFC Noise Level Guidelines[89]

Type of Receptor	Daytime 07:00 – 22:00 1-hr LAeq (dBA)	Night-time 22:00 – 07:00 1-hr LAeq (dBA)
Residential institutional or educational 10	55	45
Industrial or commercial	70	70

In line with the approach of the IFC, if changes in background noise as a result of noise emissions from the plant are no greater than 3 dBA then noise impacts are not deemed to be significant.

[8] https://www.ifc.org/content/dam/ifc/doc/2023/ifc-general-ehs-guidelines.pdf

[9] Guidelines values are for noise levels measured out of doors. Source: Guidelines for Community Noise, World Health Organization (WHO), 1999.

[10] For acceptable indoor noise levels for residential, institutional, and educational settings refer to WHO (1999).

APPLICABLE INTERNATIONAL LEGISLATION AND PROTOCOLS

International Environmental and Social Policies and Standards

- International Financing Corporation (IFC), Performance Standards (PS) (2012);
- IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution (2007);
- World Bank Group, General Environmental, Health, and Safety Guidelines (2007);
- IFC/EBRD Guidance Note: Worker's Accommodation: Processes and Standards (2009);
- Voluntary Principles on Security and Human Rights.

International conventions and protocols

- The Kyoto Protocol on Climate Change (UNFCC)

  Bulgaria ratified the Kyoto Protocol on 15 August 2002 with a commitment to reduce its GHG emissions by 8% as compared to the base year emission level. This obliges Bulgaria to assure that the future development in the country meets the conditions of the Convention.

  Relevant to the present Project are the requirements associated with the potential generation of greenhouse gas. Further conditions of relevance include:

  - Enhancement of energy efficiency in relevant sectors;
  - Protection and enhancement of sinks and reservoirs of greenhouse gases;
  - Promotion of sustainable forest management practices, afforestation and reforestation;
  - Promotion of sustainable forms of agriculture;
  - Implementation of measures to limit and/or reduce emissions of greenhouse gases; and
  - Limitation and/or reduction in methane emissions.

- The United Nations Convention on Biodiversity 1992

  This Convention seeks to conserve biodiversity and promote its sustainable use. It requires the identification and monitoring of the biodiversity in an area and adopting the necessary conservation measure. Bulgaria ratified this Convention in 1996.

- The Basel Convention 1989

  This was developed under the auspices of the United Nations Environmental Programme (UNEP) in response to the growing worldwide awareness of the problem of international traffic in hazardous waste.

  The Basel Convention 1998 is the first and foremost global environmental treaty that strictly regulates the trans-boundary movement of hazardous wastes. It obligates parties to ensure environmentally sound management, especially during the disposal process.

  The objectives of the Convention are to:

  - Ensure that waste is disposed of as near as possible to the place or source of its generation;
  - Reduce trans-boundary waste and where it cannot be avoided, to be disposed of in an environmentally sound and efficient manner; and
  - Provide assistance to developing countries in the management of hazardous waste and the generation.

- International Union for Conservation of Natural Resources Red List of Threatened Species

  The IUCN Red List, in 1994, was founded in order to provide a comprehensive inventory of the global conservation status of biological species, and to set of precise criteria to evaluate the extinction risk of thousands of species and subspecies. These criteria are applicable to all species and all regions of the world.

- Convention on the Conservation of European Wildlife and Natural Habitats, 1979, ratified by Law no. 13/1993 (Bern Convention);
- Convention on Conservation of Migratory Species of Wild Animals, 1979, ratified by Law no. 13/1998 (Bonn Convention);
- United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters 1998, ratified by Law no. 86/2000 (Aarhus Convention);
- European Convention on the Protection of the Archaeological Heritage, 1992, ratified by Law no. 150/1997 (La Valetta Convention);
- European Landscape Convention, 2000, ratified by Law no. 451/2002 (Florence Convention);
- The International Labour Organisation's Core Conventions;

ATTACHMENT 2: MITIGATION AND MANAGMENT MEASURES

MITIGATION AND MANAGEMENT COMMITTMENTS – DESIGN / PRE-FC PHASE

Objective	Activity	Action	Responsibility	Timescales	Evidence
Avoid significant impacts on sensitive receptors from the operation works.	Design / EPC Contractor Technical Specification	• Incorporate GIIP engineering controls in Project design. • Grade temporary access roads so their slope is not too large to avoid the build-up of fast-running runoff water during extreme precipitation events. • All operational equipment to ensure less than 85d(B) A at 1m from the equipment (indoors). • No noisy or high noise activities to be undertaken outside normal working hours (7am to 6pm) without prior approval of the Project Company. • Design operational lighting that is activated to work only during movement and the emitted light should be outside the ultraviolet spectrum if possible. • Design of the route of the OHTL to avoid health risk for the public and ensure the OHTL does not pass directly over any residential property • Adopt tension stringing technique to avoid impact on soils between the towers and stringing points • Ensure the drainage system includes a containment system for collecting intermittent contaminated wastewater streams, from abnormal operating scenarios • Exclude access routes which requires routing through the village of Polkovnik Lambrinovo unless there are exceptional circumstances	Contractor (detailed design)	Pre-FC[11] Pre-NTP[12]	EPC Contract[13] EPC approved Design
Confirm baseline data	Pre-construction works	• Perform pre-construction baseline noise measurements at nearest residential receptor and along R218 and local load •	Owner	Pre-construction	Noise survey report
Confirm baseline data	Pre-construction works	• Perform baseline photographic survey of buildings (immediately adjacent to road) and road condition along R218 and local road.	EPC Contractor	Pre-construction	Road and building condition report Soil contamination report
Address climate resilience measures in the technical design	Design / EPC Contractor Technical Specification	• Design project for climate projections up to 2085 – consider the need to reinforce the structures or higher design standards (stronger winds, higher temperatures). • Design access roads to consider short-term, extreme weather events. • Design any drainage to account for increased or short-term extreme precipitation patterns. • Design for increasingly frequent and extreme dust storms.	Company Contractor (subcontractors)	Pre-FC Pre-NTP	EPC Contract Technical Specification) EPC approved design

[11] Pre-NTP – Pre-Notice to proceed.

[12] Pre-FC – Pre-Financial Close.

[13] In this table, reference to "EPC Contract" refers to the inclusion of this requirement as a specific contract obligation in the EPC contract. Implementation of these requirements will be monitored during construction and operation as relevant (and noted in subsequent tables).").

Objective	Activity	Action	Responsibility	Timescales	Evidence
Reduce the use of raw materials/ potentially finite and or scarce resources.	Design / EPC Contractor Technical Specification	• Substitute raw materials or inputs with less hazardous or toxic materials wherever economically and technically feasible. • Identify opportunities to prevent waste production in the first instance. • Dry robot cleaning for PV panels. • No groundwater is to be used in the construction process. • All drinking and potable water will be tankered to the Site from a sustainable source or from existing mains municipal water. • No water can be extracted from nearby surface water in S-L Protected Area. • Use septic tanks on Site for wastewater management.	Contractor (subcontractors)	Pre-FC Pre-NTP	EPC Contract Approved Design Water Resource confirmation
Ensure biodiversity mitigation measures are incorporated into the design	Design / EPC Contractor Technical Specification	• Maintain a 250 m setback from the S-L Protected area to any temporary storage area, laydown area. • Select fencing that allows access areas/passages through which rabbits, foxes, jackals, land turtles and other small species can pass. As the size of the opening must be not less than 40/40 cm for every 100 linear meters of length of the fence along its entire perimeter	Company Contractor (subcontractors)	Pre-FC Pre-NTP	EPC Contract Approve Design

Hazardous materials and waste	Design / EPC Contractor Technical Specification	• Project contracts obligate the Project PV panel suppliers to remove panels for recycling.
		• Identify recycling options for waste, such as any electric waste, broken PV panels/modules, packaging waste, etc., through authorized/ licensed waste management companies.
		• Ensure selected PV modules include all costs for returning and decommissioning PV panels (intermittently during operation and end of life).
		• Prohibit the following materials in EPC Contract:
		  ○ Asbestos
		  ○ PCB-containing materials.
		  ○ lead-based paints
		  ○ pesticide, and herbicides defined under the Stockholm Convention.
		• Undertake due diligence of the WWTP in Silistra for alignment with GIIP where this is used.
			Company
			
			Contractor (subcontractors)
				Pre-FC
				
				Pre-NTP
					EPC Contract
					
					Approve Design

Safeguard workers and community from an emergency or abnormal events	Design / EPC Contractor Technical Specification	• The Project will have a dedicated Emergency Preparedness and Response Plan (EPRP) in place.	Company EPC contractor (subcontractors)	Pre-FC Pre-NTP	EPC Contract Approve Design
Safeguard the well-being and improve the living standards of those whose livelihoods are involuntarily displaced (OHTL)	Complete implementation of the Livelihood Restoration Plan	• Ensure all compensations prior to the commencement of the construction activities • Make all supplementary compensation payments as required in the LRF prior to construction of OHTL • Start (and complete, if possible) any livelihood restoration activities as required in the LRF before site clearance.	Project Company	Pre-construction	Evidence of compensation paid. LRP Monitoring Report Compliance report

Objective	Activity	Action	Responsibility	Timescales	Evidence
					Close out report
Promote local hiring	EPC Contract	• Unbundle procurement contracts so that local community members have a greater chance of supplying the Project and advertise employment and procurement contracts locally and in local languages. • Set target of at least 5% national participation (Bulgarian). • Confirm Silistra District communities will be considered 'local' for the purpose of local hiring. • Adopt approach to maximise “local” hiring. • Discuss with Local community leaders and local communities the employment and procurement contracts available to manage expectations of the number of local jobs that will be available. • Prioritise employment of local community members where possible. • Prioritise employment of PAPs or members of their families where possible. • Prioritise procurement of goods from local communities where possible. • Where possible, prioritise women's employment and people from vulnerable groups.	Project Company	Pre-construction	EPC Contract
Promote local provision of goods and services	EPC Contract	• Where practicable (i.e., suppliers are competitive and can meet the technical requirements which need to be achieved), the Project Company (and their contractors) will seek to procure materials and services from companies based in the neighbouring locations to ensure that positive effects of using local companies are experienced as close to the Project site as possible to enhance positive benefits of the Project for local communities. This includes SMEs owned by women which shall be identified by the Company during the Project execution stage. Details will be included within the Contractor and Supply Chain Management Plan.	Project Company EPC Contractor	Pre-construction	EPC Contract
Safeguard local community from worker influx.	EPC Contract	• All accommodation (onsite or off-site) must comply with "Worker’s Accommodation Processes and Standards”: Guidance Note by IFC and EBRD. • House workers from outside the area from the direct AOI in accommodation away from the immediate communities as much as possible, thereby reducing potential social tensions. • Community grievance mechanism provided in locations where worker accommodation is provided in local communities. • Do not undertake daily hiring or allow contractors to use at-the-gate hiring or day labourers (as per national law).	Company Contractor (subcontractors)	Pre-FC Pre-NTP	EPC Contract Approve Design

MITIGATION AND MANAGEMENT COMMITMENTS - PRE-MOBILIZATION PHASE

Objective	Activity	Action	Responsibility	Timescales	Relevant Management Plan / Monitoring / KPI
Comply with national permit requirements.	Environmental permits Labor permits Construction permits Transportation permits	• Develop Permit Register (name, phase, requirements, and lead) and set out conditions register.	Project Company / EPC Contractor	Pre-construction	Permit matrix – monthly updates
Pre-mobilisation biodiversity surveys	Pre-site clearance	• Apply a rotation scheme on small areas moving from east to west to remove vegetation around the PV facilities - panels, inverters and others in accordance with the instructions of an ecologist/biologist, as a result of monitoring (before starting removal activities of vegetation). This will enable species from the groups of amphibians, reptiles, mammals and partially from invertebrates to move to neighbouring territories and limit disturbance and possible mortality • Remove amphibians or reptiles from the areas intended for construction, in accordance with the construction scheme.	EPC Contractor	Pre-mobilisation	Biodiversity survey plan (prior to survey) Biodiversity survey report (post-survey)
Pre-mobilisation roads condition survey	Pre-construction	• Undertake a survey of the condition of the roads that will be used by construction traffic and record details. Identify areas where work may be required to improve quality/make roads suitable for construction traffic.	EPC Contractor	Pre-mobilisation	Survey report
Pre-mobilisation	Transportation routes, risk assessment and traffic counts	• Undertake transportation route risk assessment including traffic counts to better understand the potential impacts of the Project generated traffic (construction and operations)	EPC Contractor	Pre-mobilisation	Traffic risk assessment and traffic count report
Implement robust ESMS for the duration of the Project	Site implementation from NTP to COD	• Prepare the Owner ESHS Management • Establish the EPC-ESHS Management Plan	Project Company EPC Contractor	Pre-Financial close Pre-Construction	C-ESMS EPC-ESMS
Demonstrate contractor capacity to implement the E&S requirements for the Project.	Organization	• Populate Project Company Project Implementation Team (as per section 3.0 of ESMP) • Define Contractor Project Implementation Team (as per section 3.0 of ESMP)	Project Company / EPC Contractor	Pre-mobilization	Sponsor organogram (approved by Lenders)
Ensure a transparent and robust supply chain	Supplier selection	• Unbundle procurement contracts so that local community members have a greater chance of supplying the Project and advertise procurement contracts locally and in local languages. • Perform panel supply chain due diligence or obtain third-party supply chain due diligence reports to verify potential suppliers' credentials regarding the occurrence of forced labour, child labour or occupational health and safety failures. The supply chain will be mapped (to the polysilicon level) and verified by an independent consultant for the point of origin. For all other	Project Company / EPC Contractor	Pre-mobilization	Panel procurement DD (performed by Company affiliate). Supply Chain and Local Employment and Procurement (see Appendix C)

Objective	Activity	Action	Responsibility	Timescales	Relevant Management Plan / Monitoring / KPI
		materials adopt the Company Supply Chain and Procurement Policy that includes the following obligations: o Prohibit forced labour at the Site and in the supply chain. o Prohibit the hiring of child labour at the Site and in the supply chain. o Preference for using local suppliers where possible. o Maintain an employee register.			
Promote the use of local workers on the Project	Procurement of local labour and contractors	Develop Local Hiring Procedure as part of the Labour and Working Conditions Plan including: • Workforce requirements for the construction and operation phase for Company, the EPC Contractor and subcontractors, including the number of E&S personnel and their qualifications. • Key competencies for all roles with plenty of notice to mobilize local recruitment. • Hiring needs. • Local counterparts for advertising project needs (skilled and unskilled workers) may be sourced from the local labour pool. • Mechanism for promoting women working on the Project. • Prioritise local unskilled/semiskilled local employees. • Definition of working terms and conditions (salary, etc.) for each role on site. • Nominate an EPC Contractor HR manager to oversee employment matters on the Project.	Contractor (subcontractors)	Pre-mobilization	Local Hiring Plan (accepted by Project Company) EPC Contractor HR manager
Implement good international industry practice (GIIP) for site management and coordination.	Notification of works	• Following GIIP undertake the following: • Plan and give regulators advanced warning of potential problems and the start of work. • Always display on Site the emergency number for regulators and local community leaders at key worksites. • Ensure site personnel know the correct procedure for reporting incidents	EPC Contractor	Pre-mobilization	Monthly update via the PIT
	Managing sub-contractor mobilization)	• Follow IFC Good Practice Guidance note: Managing Contractors Environmental and Social Performance (section 4.5) including: • Sub-contractors should provide work completion certificates and EHS certificates to prove their past environmental performance before hiring. • Ensure subcontractors have a copy of the Project ESMP and Owner ESHS Management Sub-plans and EPC-CMPs as part of the tender process. Ensure sub-contractors attend environmental training/induction sessions (communicated to workers in their main language(s) spoken).	Contractor (subcontractors)	Part of the contractor tender process	Proof of checks, training records Site inspection records HR policies approved by EPC Contractor

Objective	Activity	Action	Responsibility	Timescales	Relevant Management Plan / Monitoring / KPI
		• Audit the performance of sub-contractors during the Project. • Adhere to the local hiring policy (see below) for prioritizing local contractors. • Require sub-contractors to provide a copy of their HR policy for approval, or they commit to following the EPC Contractor's/ Project Company HR policy that meets Lender and ILO requirements and prohibits explicitly child and forced labour use, OHS management and encourages non-discrimination.			
	Management and site control	• Nominate a person within Contractor's organization with defined responsibility for the ESHS role in Project. • All method statements to include ESHS requirements. • All PTW forms to include reference to ESHS (including community and climate risks). • Through relevant training, ensure everyone on Site is aware of their responsibilities and liabilities with respect to the environment and social responsibility. • Through site induction, inform staff and visitors of Project environmental issues and standards (including labour, climate, ESHS and security risks). • Display warning signs at key work sites prominently • Make Project Company environmental policy available to all on Site	EPC Contractor	Throughout project works	Successful third-party audit (Project Company)
		• Protect primary work sites against vandalism, theft, and breakage with permitter fence (a temporary permitter fence must be erected if the permanent site fence is not erected at mobilisation) • Define responsibilities for site's security in a Security Management Plan (as defined below) while the services are being performed. • Secure the Project boundary with a secure fence.	EPC Contractor		
	All Site works	• Establish a safe working environment with an occupational health and safety (OHS) plan that addresses potential hazards, identifies preventive and protective measures, including training and use of PPE, and describes documentation and reporting of accidents, diseases and incidents. • Where possible, the storage of materials should be carried out only in areas around the airport runway	Contractor (subcontractors)	Throughout project works	OHS Plan

Objective	Activity	Action	Responsibility	Timescales	Relevant Management Plan / Monitoring / KPI
	Liaison with the local community	• Identify the key local representatives and inform them of the Project's progress. • Nominate a community point of contact in the Contractor team and Operations team (Contractor social officer) • Display a contact board at the perimeter of key work sites stating contact details in case of a complaint or comment. • Use this board to display information about project phasing and other relevant matters. • Implement the requirements of the grievance mechanism and stakeholder engagement plan (SEP) • Deal with any grievances that arise quickly and follow the defined grievance procedure. • Create a log of grievances and ensure they are appropriately followed up and resolved.	Project Company CLO	Start of Site works – ongoing after that.	Monthly audits Communication records CLO Daily Site walk around Grievance logs Number of complaints
Ensure general site housekeeping and environmental protection	Daily and weekly site inspections of permanent work sites	• Work sites will be subjected to "walk-round" site inspection by the contractors' EHS management staff daily.	EPC Contractor (oversight by Project Company)	Throughout project works	Site inspection records Number of complaints Target zero
Asbestos	Asbestos containing material (ACM) risk assessment	• Undertake ACM risk assessment to determine the likelihood of ACM being present in the remaining and former airport buildings (construction waste). • If ACMs are identified, an ACM Management and Disposal Plan shall be developed, and appropriate ACM waste disposal shall be undertaken.	Project Company	Prior to construction	ACM risk assessment report / ACM Management and Disposal Plan
Noise	Establish baseline at all nearest noise sensitive receptors including along transportation route	• Supplement noise baseline in Polkovnik Lambrinovo at the nearest sensitive receivers. The noise level will be measured near the nearest house or other sensitive receptor in Polkovnik Lambrinovo (minimum of 2 points) and at the access road of the PV plant from road 218 during the material transport activities and compared to the admissible limits. Monitoring locations will be recorded to allow repeat monitoring if required	Project Company	To be completed before start of construction	Noise baseline report
Vibration	Conduct photographic survey of properties along the R218 and "local access road"	• Obtain photographic baseline along R218 and "local road" in case of complaints or instances of dilapidation which may be attributed to the	Project Company	To be completed before start of construction	Road and property condition report

MITIGATION AND MANAGEMENT COMMITMENTS – CONSTRUCTION

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
Minimise dust generation within the direct AOI (250m from the works)	Earthworks, material handling (measures to control dust from vehicle activities described under traffic and transportation) (C&D) Infrequent maintenance activities (O&M).	As part of the Environment, Pollution Prevention and Control CMP, develop procedures for the implementation of the following GIIP and the requirements of the Project Owner Pollution Prevention and Control Plan: • Locate activities and rock/earth stockpiles more 250m from the S-L Protected Area. • No plant or equipment to be stored less than 250m from the L-S Protected Area • Construction Traffic Management Plan (CTMP) to incorporate all relevant mitigation measures for vehicle movement nearby and within the project areas • Use off-site concrete batching off-site for all concrete needs. • Minimise stockpiling of soil and earthen material through coordination of earthworks and excavation activities (excavation, grading, compacting, etc.) • Demarcate work areas and access roads. • Cover or dampen temporary stockpiles to prevent wind whipping when not in active use for period extending over 24 hours. Keep temporary stockpiles for the shortest possible time (24 hours after certification of activity in the cable trench, all cables must be covered, and portion of the trench closed). • Consider the prevailing wind direction when siting stockpiles to reduce the likelihood of affecting sensitive receptors • Burning of any material anywhere on the Project construction sites is strictly prohibited • Minimise amounts of material handling and avoid double handling. • Minimise open excavation areas • Backfill and compact as soon as reasonably practicable after completion (final revegetation approach is discussed elsewhere) Ensure all vehicles carrying loose or potentially dusty material are fully sheeted to or from the Site. • Cement and other fine powders will be sealed or put in bunded containers after use. • Regular (2 x daily) visual monitoring of dust episodes, soiling of vegetation, dust resuspension on the roads and dust clouds. • Minimise vegetation clearance (when is possible) to reduce exposure of bare soil Provide workers with relevant PPE, including dust masks. • • Construct new road sections following site clearance and stockpile management requirements, ~~including covering stockpiles to minimise dust events.~~ • Maintaining cleanliness by removing dust from machines and vehicles must be a daily practice (sprinkling, vacuuming, cloths). • Excavation, handling, and transport of erodible materials shall be avoided under high wind conditions (>30 km/h) • Use water (from a sustainable source) • Demarcate delivery road and access tracks at the Site and ensure all workers stick to the demarcated area. •	EPC Contractor (subcontractors)	Construction	Site inspection records Community grievances

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
Minimize the impact of fugitive emissions from vehicle exhausts and equipment on receptors along with the direct AOI and delivery routes up to the Material and Equipment Laydown Area.	Earthworks, material handling/vehicle movements	As part of the Environment, Pollution Prevention and Control CMP, develop procedures for the implementation of the following GIIP and the requirements of the Project Owner Pollution Prevention and Control Plan: • Use modern machines and equipment, for new engines, emission control systems, ~~considering the global trend~~ of manufacturing engines with low fuel consumption on power unit and restrictive emission control. • Conduct periodic checks, according to the legislation in the field, for the machines and means of transport involved in the construction works, so that they are in good technical condition and do not emit exhaust gases beyond the permitted limits. • All construction machinery and equipment to be maintained in good working order • Monitor all engines and equipment that are turned off when not in use. • Locate machinery and dust-causing activities (e.g., access roads, stockpiles) away from nearby sensitive receptors where practicable and more than 250m from the S-L Protected Area. • Minimise movement of construction traffic around the Site (use demarcated routes only). • Keep vehicle movements to a minimum. • Enforce speed limits and reduce vehicle movements (maximum of 10km/h) for project vehicles on unsurfaced roads).	EPC Contractor (subcontractors)	Construction	Site inspection records Construction reports
Minimise noise emissions	Operation of site equipment	• Demarcate specific routes from the existing road to the right of way that maintain a buffer of at least 250m from NSR where possible. • Restriction of construction activities to daytime hours and weekdays • Install temporary noise barriers when carrying out foundation piling and other noisy works within 50 metres of residential property boundaries. Barriers 10 metres in length around each noise source, 4 metres high and overlapping the noise source by two metres; barriers shall have a noise reduction index of 29dB. (Note – noise reduction may be achieved using straw bales as the noise barrier.) • No noisy or high-noise activities are to be undertaken outside regular working hours (7 am to 6 pm) without prior approval of the Project Company • Install manufacturer approved mufflers on engine exhausts and compressor components • Avoid simultaneous different work activities that generate high levels of noise/ vibration emissions • Inform nearby dwellings on the timing and duration of works and when the noisiest stages will likely occur (ongoing through the process) (via the Owner CLO). • Plant and equipment are to be examined daily for defects before the start of work, and under no circumstances should defective equipment be used. • Acoustic covers on machine engines are to remain closed when in operation. • Avoid unnecessary revving of engines and equipment to be switched off when not in use. • Site operatives are to be briefed on keeping noise to a minimum. • No blasting without prior approval of the Project Company or without a blasting plan that compiles with national law.	EPC Contractor (subcontractors)	Construction	Site inspection records Construction reports

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		• Locate static plant (e.g., generators) to take advantage of anyscreening to break the line of ~~sight from receptors and minimise noise.~~ • Brief site operatives to keep noise minimal as part of the induction process. • Following the SEP, inform receptors when work will commence and any particular noisy works. • Use the community grievance mechanism (CGM) to receive and process noise complaints.			
	Construction traffic	• Limit vehicle speeds on-site to a maximum of 20km per hour. • All vehicles to undergo regular maintenance schedules following national statutory requirements. • Monitor noise at NSR during piling works (at least 4 times per day).	EPC Contractor (subcontractors)	Construction	Site inspection records Construction reports

Minimise waste generation	Construction PB/BESS/OHTL / substation	• Select PV panel suppliers that can ensure take-back and recycling of PV panels during the operation phase and end-of-life decommissioning.
		• Ensure selected PV modules and battery supplier contract includes all costs for returning and decommissioning PV panels (intermittently during operation and end of life).
		• Prohibit the following materials in EPC Contract / Procurement Policy
		  ○ Asbestos
		  ○ PCB containing materials
		  ○ Lead-based paints
		  ○ Pesticides and herbicide**s** as defined under the Stockholm convention.
		• Consider off-site manufacture and design for disassembly to minimise resource use.
			Project Company	Construction	Waste logs

Minimise impact on water resources	Construction PV/OHTL / substation	• Construct the perimeter drainage system, to act as a cut-off drain to protect the S-L Protected Area during earthworks as set out in Pollution Prevention and Control Plan which includes the surface water management requirements. • Ensure the drainage system includes a containment system for collecting intermittent contaminated wastewater streams, from abnormal operating scenarios ~~or during wet cleaning of panels (maximum of 4 times per year).~~ • No storage or laydown areas within 250 m of the S-L Protected Area • No groundwater abstractions for potable or construction-related purposes. • Sanitary waste will be collected in portable latrines or septic tanks, and wastewater will be collected for disposal off-site in a municipal wastewater treatment facility (under licence). • Portable latrines or septic tanks must be installed at least 250m from the S_L Protected Area, with leak prevention and detection measures. • Undertake groundwork to ensure appropriate site drainage (avoiding risk of contaminated runoff) • No direct discharge or uncontrolled releases of potentially contaminated water to the ground, e.g., concrete washout or oily wastewater (see actions on spill control below). • Establish a controlled concrete washout area (on Site) (note – no concrete batching on site) • Areas where spillage of contaminants occurs should be excavated (to the depth of contamination) and suitably rehabilitated. If any other minor spillage occurs, it should be cleaned immediately, and the contaminated area should be rehabilitated. • The washing of Project vehicles in any surface water bodies in and around Project site(s) will be strictly prohibited. All Project vehicles should be washed at designated wash bays on site/s. These wash bays will include oil/grease and sediment traps for grey water.	EPC Contractor (subcontractors)	Construction	Site inspection records Construction reports

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		• Prevent any ad-hoc maintenance of vehicles/equipment in and around the Project site(s). All vehicles/equipment should be maintained at a designated workshop. The workshop will include an oil/grease trap. • Maintain all active work areas in a good and tidy condition; debris and waste should be contained in such a way that they cannot become entrained into surface run during periods of heavy rain. • The management of sewage should be taken over by a licenced contractor. • Provide hazardous waste storage areas with secondary containment. Moreover, hazardous waste should be stored in sealed/covered containers to prevent rainwater intrusion. • Provide all dangerous and hazardous material stores and handling areas with secondary containment capable of holding 110% of the total capacity of all tanks/vessels. • Confine the loading and unloading of dangerous and hazardous material to areas that are provided with secondary containment and in line with hazardous material handling procedures.			
Sustainable water use	Construction PV/OHTL / substation	• Drinking/potable and construction water will be sourced from the municipal supply and tankered to the Site (under permit). • All concrete will be delivered to the Site pre-mixed with approved water use licences. • Potable water should be obtained from a sustainable source (and not obtained from S-L Protected Area).	EPC Contractor (subcontractors)	Construction	Site inspection records Construction reports
Minimise impact from wastewater	PV Site/ROW clearance	The contractor will develop a Wastewater Management Plan in compliance with Bulgarian legislation, IFI Requirements and GIIP (good international industry practice) that will also include measures to ensure: • Temporary offices have adequate wastewater handling and disposal facilities. Their disposal must be made in close collaboration with the local government authorities (i.e., municipalities) and licensed companies. • Provide sufficient toilets at active work areas for staff and workers and these should be serviced regularly by a competent and suitably qualified person. • Undertake due diligence of the WWTP in Silistra for alignment with GIIP • Excavation must not occur in extreme weather conditions (rain, strong wind). • Prohibit discharge of the resulting water during the construction period, on the ground, on the site or in the vicinity. • Removal of oil products accidentally leaked from machines in operation will be carried out using absorbent materials that will then be stored in specially arranged spaces and handed over to the authorized units for collection and/or disposal. • Handling of materials or other substances used in technologies will be carried out in such a way as to avoid their dissolution and entrainment by precipitation waters. • Equipment and vehicles will be periodically checked to avoid the possibility of accidental leaks due to defects. • Storage of materials within the construction site must be secure with adequate and efficient handling practices to avoid losses and accidental pollution • Provide culverts along temporary and permanent site roads to facilitate drainage along with ditches. Where practical, exposed surfaces and dust generating materials should be covered. • Washing of vehicles and equipment will be done exclusively in areas specially designed for such operations.	EPC Contractor	Construction	Wastewater discharges

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		• Avoidance of refuelling on site to prevent oil spills. If this is not possible, procedures will be developed to avoid accidental spillage, like providing drip trays and bunding for storing fuel and waste chemicals/ substances. In case of accidental leakage of petroleum products, absorbent substances will be applied immediately. • Areas where spillage of contaminants occurs should be excavated (to the depth of contamination) and suitably rehabilitated. If any other minor spillage occurs, it should be cleaned immediately, and the contaminated area should be rehabilitated. • Responsible storage and disposal of liquid effluents such as sewage from temporary accommodation using certified disposal companies. • Intermediate storage of bulk construction materials, which can be washed away by rainwater and can pollute the soil, subsoil and underground water, must be stored in closed or covered spaces; materials will be transported in conditions that limit the pollution of the atmosphere by sprinkling the material, covering it, using trucks with buckets/containers suitable for the type of material transported, etc. • The work schedule must prevent overcrowding of the site with materials, as well as storage of material stocks on the site for excessive timescales. • Technology for executing the project's objectives will be respected, taking measures to prevent and combat accidental pollution. • Comply with the environmental and execution conditions of the works imposed in the project for the execution of the works. • Good general housekeeping. • Conduct continuous training and education awareness of all project employees regarding waste management practices to avoid reducing the risks of waste generation and potential impact during the construction phase. • Sanitary wastewater tanks to be properly maintained and inspected to ensure tanks do not overflow. • Site inspections will be carried out regularly by the EPC Contractor to ensure that all wastewater generated is properly managed, and no leakages or spill occur. In the event of a spill or overflow, immediate action will be taken in accordance with spill containment procedures and clean up procedures. • Engage a licensed waste/wastewater contractor for the periodic emptying of septic tanks. • Any wastewater disposed of offsite must be assigned to appropriately licenced waste contractors and be transported to appropriate wastewater managements facilities.			
Minimise road hazards, congestion, and damage to road infrastructure (surfaced roads) and residents along the route (see also CHS below)	PV Site/ROW clearance Equipment delivery	• Contractors should use a pre-defined route to the material and equipment laydown area (EPC to confirm delivery route) • Design laydown area and delivery approach to minimize vehicle stopping outside the site • Obtain any necessary approvals. • Include clause in the EPC contract that that any damage to road (wear and tear over the construction period) must be repaired promptly and that roads are left in original or better condition at the end of construction activities • Survey the condition of roads to be used for concrete supply, equipment, and component deliveries prior to construction and submit reports to local road authorities. (pre-construction). • Undertake periodic route and access surveys throughout construction on road conditions and ensure that any damage to existing roads is repaired promptly and that roads are left in original or better condition at the end of construction activities	EPC Contractor (subcontractors)	Construction	Approved Traffic and Transportation Management Plan Training logs/ attendance sheets Signage in place

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		• Undertake road improvements where needed to facilitate road traffic generated by the Project. • Consider excluding access option three which requires access through the village of Polkovnik Lambrinovo. • Work with local authorities in scheduling truck deliveries, especially oversized truck deliveries, to reduce impacts on road function and safety. Specifically, where safe and feasible, schedule deliveries to minimise travel impacts for other road users based upon local conditions and the results of stakeholder engagement. • Consider scheduling deliveries to avoid local village commuting periods and school start and finish times for the local villages in the vicinity of the site and at intervals to avoid queuing of delivery vehicles along public roads near the access points to internal Project roads. • Demarcate delivery roads and access tracks across the site and ensure all workers stick to demarcated areas. • CLO to engage the local community to inform them of the start of construction works and timings for large vehicle deliveries • Install appropriate signage to inform local communities and road users of site access points. • No night-time driving along unsurfaced roads. • No night-time deliveries • Maximum of 40km/h on the section of road between R218 and Polkovnik Lambrinovo • Signage on R218 and local roads after Silistra to advise road users of the construction site entrance. • No stopping of Project-related vehicles or abnormal loads is allowed between Silistra and the Project site. • Support the Owner to attend awareness campaigns on risks related to the traffic increase, especially in the schools present in the area			
Develop Transport and Traffic management Plan (TMP)	Project construction and operations	Develop TMP to include the following GIIP and align with IFC EHS General Guidelines. Include in TMP the following GIIP as a minimum: • Measures to transport Project components as well as transportation of workers. • All drivers to undergo a driver induction. • Prepare a disclosure plan for community members, to inform them of the start of construction works and timing and Project impacts along transportation routes. • Provisions for local communities to be informed, in a timely manner, about road closures, works on roads or use of heavy good vehicles. • Plan and implement awareness campaigns on risks related to the traffic increase, especially in the schools present in the area. • Details of transportation patrol/ escort vehicles and/or possible police escort to guarantee safety of other road users and to inform the respective authority for the overloaded trucks.			

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		• Address transportation safety risks of Project traffic, including (but not limited to) truck routes, hours of transport, community notification, signage, education, and other measures to minimise safety hazards (construction, decommissioning) • Obtain permits and implement all necessary road improvements or alterations prior to deliveries. If necessary, construct bypasses to avoid hazards to properties or other road users at constrained road segments or intersections. (pre-construction, construction, decommissioning) • Plan truck routes for non-oversized loads using roads with adequate geometrics and load-bearing capacity for safe passage (pre-construction, construction, operations, decommissioning) • Consider community schedules that result in higher levels of local traffic, school schedules, or community events. Schedule truck traffic outside of these times in addition to avoiding periods of peak traffic volumes (construction, operations, decommissioning) • Undertake route and access surveys on road condition and ensure that damage to existing roads is repaired promptly and that roads are left in original or better condition at the end of construction activities. • Restore signs, streetlights and other street furniture removed for or damaged by the movement of Project-related trucks (construction, decommissioning) • Work with local road authorities to identify damage to and restore county, communal, and agricultural roads used for Project-related traffic. • Coordinate with national road authorities (the Bulgarian Road Infrastructure Agency (RIA)) to coordinate and contribute to repair and maintenance of national roads damaged by construction (construction, decommissioning). • If temporary access roads are necessary, the land required for these works will be returned to its original condition. • Possible use of flag men or other means of traffic control at key points on roads, especially during school hours in hotspot areas • All vehicle drivers must be in possession of valid driver's license for the class of vehicle they drive • Frequent testing of drivers to enforce no drink driving requirement, also check for use of seatbelts and identify speed limits that are monitored during the construction phase. • All drivers must use only designated routes • All traffic signs must be respected • No vehicles should be driven if loaded in excess of its manufacturer-specified weight bearing capacity • Use of cell phones while driving is prohibited • All accidents and traffic violations must be reported by drivers to the Project management team • Only company employees are to be transported in the company vehicle			

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
Minimise road hazards, congestion and damage to road infrastructure (unsurfaced roads/construction areas)	Equipment delivery	• Ensure drivers are trained to drive heavy goods vehicles (HGVs) on unsurfaced roads (where necessary). • Check that all drivers have the necessary license for their vehicles. • Ensure all vehicles have up-to-date maintenance records. • Minimise transport of workers along the unsurfaced road sections and use pool vehicles where possible. • Notify the Project Company at least 10 days in advance of start of PV Panel deliveries and abnormal loads so that they may inform the local communities about the delivery of any wide/heavy loads and how it could impact their road use.	EPC Contractor (subcontractors)	Construction	Traffic and Transport (Logistics) CMP Training logs/ attendance sheets Maintenance records Meeting minutes/ attendance sheets/ (SE log – maintained by Project Company)

Minimise traffic-related accidents (surfaced and unsurfaced roads)	Equipment delivery	• Demarcate delivery roads and access tracks across the Site and ensure all workers stick to the demarcated area.
		• Maximum of 40km/h on the section of national roads used to access the Site.
		• Minimise pedestrian interaction with construction vehicles.
		• All drivers are to undergo a driver's induction training (including induction on national speed limits, rules of the road and safety signage on site)
		• Employ safe traffic control measures, including road signs and flag persons, to warn of dangerous conditions along the unsurfaced road to the work fronts.
		• Report all traffic accidents and statistics in weekly EHS reporting (all contractors)
		• All drivers carrying personnel or material along unsurfaced roads must undertake off-road driver training.
		• Provide awareness training to receptors (local residents).
		• No night-time driving along unsurfaced roads.
		• Establish and implement standards addressing the following:
		  ○ Training and accreditation for project drivers, including contractors.
		  ○ Driver fitness standards, including mandatory rest periods and prohibition of drug/alcohol use.
		  ○ Project and contractor standards for vehicle safety and maintenance.
		  ○ Security response for vehicle incidents.
		  ○ Load stability standards.
			EPC Contractor (subcontractors)	Construction	Training logs/ attendance sheets

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
Minimise impact to soils (contamination)	Site/ROW clearance	Develop a Topsoil Management and Site Reinstatement CMP that includes the following GIIP requirements and aligns with IFC EHS Guidelines: General: • Refuelling of delivery vehicles is to be undertaken in Silistra. • Refuelling plant and equipment (on-site) will be carried out in a designated area and on hard standing ground to prevent seepage of any spillages to soil/groundwater. • Drip trays must be used when refuelling and servicing vehicles or equipment not on the designated refuelling hardstanding surface. • No-unregulated offsite drainage. • Spill containment and clean-up kits will be available on-site, and clean-up from any spill shall be appropriately contained and disposed of at a bound landfill site. • Preparation of guidelines and procedures for immediate clean-up actions following any oil, fuel or chemical spillages. • Develop a site-specific Emergency Response Plan for soil clean-up and decontamination. • Implement a training program to familiarize staff with emergency procedures and practices related to contamination events. • Develop and implement a waste management plan (as part of the cESMS) to ensure that waste is disposed of correctly such that soil contamination is minimized. • Fuel, oil, and used oil storage areas shall be contained in bunds of 110 per cent capacity of the stored material with impermeable bases and bunds and more than 70m from the S-L Protected Area. • Storage containers will be regularly checked and maintained • Construction vehicles/pieces of machinery and equipment shall be serviced regularly at off-site locations • Ensure that all construction plant and equipment are maintained in a good state of repair with minimal leaks. • Adequate sanitary facilities should be provided for the construction workforce. One mini toilet is recommended for every seven workers and not less than 1:15 workers. • Licensed companies shall be contracted to manage and dispose of wastes, wastewater and sludge from the septic tank.	EPC Contractor (subcontractors)	Construction	Environment, Pollution Prevention and Control CMP Site inspection records Construction reports
Minimise impact to soils (degradation)	Site/ROW clearance	• Existing excavated material from clearance of the site (undertaken prior to commencement of the project) will be handled and disposed of (if necessary) appropriately taking into account Bulgarian waste management and other relevant requirements and provisions of this ESMP. • Demarcate specific tracks to site/ROW and track vehicles to ensure only demarcated routes are used. • Confine traffic movement to designated routes/tarmac areas within the PV Site. • Control access to areas within the Site that are not required for construction. • Topsoil will be stored and used to rehabilitate affected construction areas. The topsoil stockpiles' height should not exceed 2m.	EPC Contractor (subcontractors)	Construction phase	Site inspection records Construction reports

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
Implement sustainable site clearance and rehabilitation practices to avoid impact on natural habitats.	Site/ROW clearance	• Existing excavated material from clearance of the site (undertaken prior to commencement of the project) will be handled and disposed of (if necessary) appropriately taking into account Bulgarian waste management and other relevant requirements and provisions of this ESMP. • Demarcate the PV plant construction zone and servitude for the TL corridor on a map and on the ground clearly using high visibility tape or other high visibility method, to avoid impacting on sensitive areas outside of the permitted construction area • Implement relevant construction standards (e.g. 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites' – DEFRA, 20096F6F). • Topsoil Management and Site Reinstatement MP will address topsoil removal following sustainable land-use practices: • When stripping, stockpiling, or placing soil, do so in the driest condition possible and use tracked equipment to reduce compaction. • Topsoil to be stripped to a thickness defined by depth below the surface and a distinct colour change. • Clearly define topsoil and sub-soil stockpiles of different soil materials for reuse of topsoil. • Immediately restore topsoil and vegetative cover using seeded restoration techniques for all disturbed areas (where work is not planned) in the PV Site • Reuse materials on-site wherever possible • No imported soils or aggregates • Organic topsoil (superficial layers) will be used on-site and near the Site for revegetation activities.	EPC Contractor (subcontractors)	Plan – pre-NTP Construction phase	Site inspection records Construction reports
Minimise secondary impacts on soils from vegetation removal and works.	Site / ROW rehabilitation	• Rehabilitate the compacted area to support the return of the impacted area to the original state as quickly as possible following the completion of the works. This may require aeration of the topsoil, enrichment of the topsoil or reintroduction of selected species and shrubs. Do not rely on natural rehabilitation (separate to landscaping and natural habitat requirements that may be needed as part of BMP obligations). • Reflect natural gradient and relief when reinstating soils.	EPC Contractor (subcontractors)	Construction phase	Rehabilitation plan
Ensure appropriate handling, storage, and disposal of solid and hazardous waste to minimize impacts to groundwater, land, and workers.	Site/ROW clearance	• Existing excavated material from clearance of the site (undertaken prior to commencement of the project) will be handled and disposed of (if necessary) appropriately taking into account Bulgarian waste management and other relevant requirements and provisions of this ESMP. • Environment, Pollution Prevention and Control MP to include a Waste Management Plan (WMP) to include the following GIIP requirements and to meet WBG EHS General Guidelines: • Identity and characterise the source of all waste streams (hazardous and non-hazardous) and the proposed final disposal option (Site waste management) • Define and demarcate dedicated temporary waste collection site at the worksite • EPC contractor is required to conduct a duty of care audit for proposed general waste, construction waste, hazardous waste and recycling facilities in the municipality and region to confirm compliance with GIIP for acceptance by the Project Company.	(subcontractors)	Plan – pre-NTP Construction phase	Environment, Pollution Prevention and Control CMP Site inspection records Construction reports Waste Management CMP

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		• Perform due diligence and identify temporary waste storage and collection points (hazardous and non-hazardous) at the Site for coordinated onward transportation and disposal at a licenced facility. • EPC contractor to ensure all subcontractors use approved waste disposal routes only following the outcomes of the waste due diligence audits. • Offices required to have adequate waste handling and disposal facilities. • Arrangements for collecting non-hazardous and hazardous wastes must include on-site waste bin equipment provisions. • Waste bins to be segregated according to the waste stream, e.g., organic, hazardous, paper/cardboard, plastic, and metallic waste. Their disposal and recycling must be made in close collaboration with the local government authorities (i.e., municipalities) and licensed waste recycling companies. • Provision of chemical/ mini toilets for workers at construction area and flushing toilets and septic tanks for construction workers at site and construction officers at a ratio of 1:7 and maximum of 1:15 (toilet to workers), respectively, to maintain hygienic and clean surroundings. • Segregation, reuse and, where feasible, recycling of wastes by registered operator; construction contractor must follow the 3R (reduce, reuse, recycle) policy to manage the solid wastes • Site all temporary onsite waste storage areas at least 250m from the L-S Protected area • Identify waste reuse and recycling disposal routes to process waste streams (following Bulgarian requirements) and set up agreements • Identify construction waste landfill • Obtain copies of licenses and authority of final disposal locations • Identify and contract authorized transportation company to take waste to the disposal facility (in particular hazardous waste) • Waste storage/collection areas shall be fenced, with an impermeable base and equipped with relevant signage (e.g., urban waste collection area) • Segregate waste material on-site for disposal via the identified channels as per SWMP) • All skips/waste storage to be suitably covered (to avoid dispersion of light materials by wind or filling of skip with rain) and waterproofing to avoid soil contamination from leachate. • Hazardous waste must be designed according to GIIP (bunding, separating incompatible hazardous substations, etc.) as defined in WBG EHS General Guidelines and in line with national requirements. • Liquid wastes/oil/chemicals will be stored in tanks or drums in bunded areas that can hold the larger of 110 percent of the largest tank or 25% percent of the combined tank volumes in areas with above-ground tanks with a total storage volume equal or greater than 1,000 litres and will be made of impervious, chemically resistant material according to national safety requirements and WBG EHS General Guidelines, whichever is stricter.			

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		• Avoidance of refuelling on site to prevent oil spills. If this is not possible, procedures will be developed to avoid accidental spillage, like providing drip trays and bunding for storing fuel and waste chemicals/ substances • Implement good housekeeping and operating practices, including inventory control, to reduce waste from out-of-date materials, off-specification, contamination, damage, or excess to plant needs. • Define and establish a documentation management system for tracking waste (duty of care) • Maintain a hazardous waste inventory. • Conduct continuous training and education awareness of all employees of the project regarding waste management practices in order to avoid, reduce the risks of waste generation and potential impact during the construction phase.			
Prevent leaks, spills, and environmental incidents.	Site establishment & Construction	EPC contractor to develop a spills response protocol (as part of the Environment, Pollution Prevention and Control CMP), including requirements to: • Maintain an inventory of hazardous materials and specific procedures/ controls • Maintain available copies on Site of material safety data sheets (MSDS) for all hazardous substances used during the Project: • Establish hazardous materials storage areas that are located away from existing sensitive receptors and are secure from theft or vandalism, well-ventilated, and have suitable emergency response equipment (fire extinguisher, eye wash etc.) and PPE. • Ensure spill kits are located and first response equipment at all work fronts. • Ensure no hazardous materials are stored in large quantities at the work fronts or the central materials store and laydown area.	EPC Contractor (subcontractor)	Plan – pre-NTP Construction phase	Spills Response Protocol (Environment, Pollution Prevention and Control MP) Site inspection records Construction reports
Minimise impact on habitats – General	Construction stage	• Develop Environment, Pollution Prevention and Control MP aligned with the requirements of Project Company Biodiversity management Plan (002) plus the following GIIP: • Use existing access roads or upgrade existing roads wherever possible before considering new access road construction • Restrict vehicles to the use of only authorized access roads • Minimise use of trenches or other steep-walled excavations • Backfill open excavations as soon as possible after construction activity. • Ensure signage, inclusion in worker's code of conduct and training to prevent construction workers from poaching and to promote protection of wildlife. • Fence localised worksites before the start of construction works to avoid encroachment by mammals. • For OHTL works, do not leave trenches open overnight unless they are fenced. • Prohibit poaching (focusing on CITES species) and interactions with fauna and flora in the worker code of conduct. • Worker/contractor training/awareness, supervision regarding impacts to animals and species protection. • During construction, minimise impact to neighbouring territories - such as trampling, passage of heavy equipment, storage of materials and this limit disturbance, reduce	EPC Contractor (subcontractors)	Plan – pre-NTP Construction phase	Pollution Prevention and Control CMP Site inspection records Construction reports

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		affected areas to limit potential deaths of individuals, i.e. the impact on species will be limited to the areas of construction and will not cause the same effects over larger areas. • Where possible, the storage of materials should be carried out only in areas around the airport runway - this will lead to limiting the effects of temporary soil damage and reducing the area for reproduction, development and foraging in most animal groups and will reduce the additional trampling of territory and changes in mechanical composition so important to invertebrates • All activities should be carried out only during the daylight hours to reduce the disturbance of nocturnal animals. • In the event that a site perimeter fence is installed (preferred) - provide access areas/passages through which rabbits, foxes, jackals, land turtles and other small species can pass. As the size of the opening must be not less than 40/40 cm for every 100 linear meters of length of the fence along its entire perimeter. • Reduce the speed limit of equipment and personnel vehicles to 15km/h within the Lambrinovo airport's runway and road areas to reduce the risk of amphibians, small mammals, and invertebrates being run over. • Prohibit the use of herbicides to limit the spread of grass, tree and shrub vegetation in PP areas - this will limit possible negative effects on insects, amphibians and entrants, such as mortality or possible diseases. • Compile a suitable Invasive Alien Plant (IAP) species control plan and programme to manage IAP's within the control of the development • Implement IAP species surveillance and control plan within areas in the projects control, focusing particularly on areas of natural habitat • Monitor IAPs to inform further management intervention. • Prohibit the use of pest control measures (rodenticides) to limit the population of rodents - it will cause unwanted mortality among rodents, but also re-poisoning of predatory mammals or birds. • In the areas where no PV installations are constructed, but are part of the plant's service areas, grass and shrub vegetation should not be removed or should be revegetated. This will enable these areas to serve as temporary and permanent refuges for amphibians, reptiles, mammals and invertebrates • Minimize further soil/vegetation disturbance during construction. • Use only demarcated area for laydown and access (construction and operation)			
Raise worker awareness of the biodiversity risks	Construction works (PV/OHTL)	• Add the following to the Project specific Worker Code of Conduct - "Workers are prohibited from: o Removing flora from the work area o Hunting any species o Interaction with large mammals' Penalties to be imposed for infractions • During the site induction, make workers aware of biodiversity sensitivities (including snakes and AIS)	EPC Contractor (subcontractors)	Construction phase	Site inspection records Construction reports

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
Manage potential unexpected discovery of archaeological remains/ artefacts	Substation, PV and OHTL foundation work	• Establish a chance-find procedure (including national and lender requirements and following GIIP) for the construction phase or any phase that requires excavation work in accordance with Project Company Chance Finds Plan (011) • Train workers on chance finds procedure during induction and all excavation works (via toolbox talks). • Maintain a chance finds log. • Notify the National Institute of Archaeology under the Academy of Sciences of Bulgaria of any finds. • Carry out ongoing discussions with local community members about the cultural significance of the Site as part of broader public consultation exercises.	EPC Contractor (subcontractors)	Construction phase	Contract with IOA Chance Finds Procedure Toolbox talk logs Chance finds the register (if necessary)
Safeguard the wellbeing and improve the living standards of those whose livelihoods are involuntarily displaced.	Livelihood restoration	• Implement ongoing livelihood restoration activities (if not already completed before construction) as per the LRF (013). ○ Prepare LRF close out report	Project Company	Construction phase	Close out report
Protect worker health and safety.	All construction and operations activities	• Require EPC Contractor to be certified to ISO 45001 (or equivalent) • All contractors and subcontractors to implement Project OHS requirements • Incorporate measures to reduce the risk of hazards impacting the project as per national codes and norms and international standard specifications • Develop an Emergency Preparedness and Response Plan (EPR) which includes responsibilities and actions in case of emergency situations and considers community as well as worker and asset protection/impact limitation (se below). Establish Occupational Health and Safety (OHS) Management Plan in accordance with Employer OHS (009) including *inter alia:* • Management measures for occupational dust, occupational noise, falls from height, electrocution risks etc. • Require EPC contractor to implement communication systems to enable communications from any part of the site. • Specify safety signage throughout the Project site, following GIIP specifications and codes of practice. • Preventative maintenance to ensure the robust connection of the lightning protection (earthing) system • Site risk assessment for all tasks to be undertaken on the Site. • Recommended techniques to prevent the electrocution hazards include use of signs, barriers, to prevent shock • Provision of automatic fire detection systems linked to automatic shutdown systems to allow fires to be dealt with in the shortest possible time by disconnection from the power supply systems. This includes substations • After any damage has been assessed and documented in case of storm damage / wind damage etc, the utility companies will be notified. Lastly, if safe to do so, damaged areas will be protected from further damage	EPC Contractor (subcontractors)	Construction phase	Occupational Health and Safety Management Plan Risk assessment Worker Code of Conduct Worker Induction Program Training logs/ attendance sheets Audit reports Incident reports

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		• Communicate hazards and risks to all workers during setting-to-work briefings. • Mandatory PPE, including steel-toe capped boots, overalls, hard hat, hi-vis vest, safety glasses, hard hat AND ear protection, gloves, and dust masks for specific tasks (e.g., welding). • Worker induction programme. • Worker Code of Conduct. • Training to all workers ongoing throughout construction and including toolbox talks and regular refresher training where needed. • Drills (including OHS, spills, and emergency drills) should be undertaken regularly • OHS inspection and audits and ensure there is a corrective action process. • Establish an accident and incident reporting procedure for accidents, diseases, incidents, near misses, positive interventions etc. • Provide incentives for reporting near misses and positive interventions and observations. • EPC Contractor and subcontractors to hire EHS Managers and Officers (1:50 for construction workforce) Develop a project specific Emergency Preparedness and Response Plan (EPRP) • Ensure medical preparedness includes coordination with offsite medical facilities, and as per medical risk assessment possible need forpermanent on-site paramedic, first aid facilities and first aiders (ratio of 1:50 first aiders/workers) • Provide worker shelter, toilets and provisions (including drinking water) at work fronts across the site (not just at the main site camp). • EPC contractor to employ at least one EHS Manager and an EPC Contractor HSE Officer for every 50 workers. • Subcontractors with more than 20 workers shall deploy a dedicated HSE Officer and an additional HSE Officer for each additional 50 workers deployed onsite.			
Protect community health and safety.	All works	• Prepare a disclosure plan for community members, to inform as to the start of construction works and timing and Project impacts along the transportation route. • Undertake a stakeholder engagement campaign to inform community members of the possible risks and impacts of the construction of the Project (refer to SEP), including traffic, grievance mechanism, worker conduct, GBVH risks • Disclose community grievance mechanism to local communities and houses surrounding worker accommodation. • Prepare a plan/strategy to guard workers and community members against contracting communicable diseases.	Owner	Construction phase	Sep disclosure plan

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI

Protect community health and safety.	All works	• Incorporate community safety requirements into the project design.
		• Develop an Emergency Preparedness and Response Plan (EPR) which includes responsibilities and actions in case of emergency situations and considers community as well as worker and asset protection/impact limitation (see below).
		• Where necessary include fencing, safety signage (in locally used languages) and other relevant features to deter community members from entering the Project site.
		• Installation of anti-climbing devices to avoid accidental or intentional attempts to access the site
		• Painting with fluorescent colours of towers near the roads to make them visible.
		• Undertake cultural awareness training for migrant workers, should it be deemed necessary.
		• Undertake OHS and emergency drills throughout the construction and operations phases.
		• House workers from outside the project area or municipality in accommodation away from the immediate directly affected communities as much as possible, thereby reducing potential social tension.
		• Adopt the Project Worker Code of Conduct to be read and signed by all workers on the contract during the induction process.
		• Include in the worker code of conduct, requirements for addressing potential gender-based violence and harassment (GBVH) risks on the Project and setting out a zero-tolerance policy for the following:
		  ○ Use of drugs or alcohol
		  ○ Incidents of GBVH
		  ○ Security personnel to not be armed unless prior approval from Project Company
		  ○ Ensure the security and plan includes requirements for vetting security guards, training on using force, security guard code of conduct etc.
		  ○ Employ local security guards and female guards where possible.
		  ○ Establish signs across the Project Site and along roads to warn local community members and other external stakeholders of any risks and hazards, e.g., from site vehicles and electrical equipment.
		  ○ Provide cultural awareness training for all workers.
		  ○ Nominate a community liaison officer (CLO) counterpart (social officer) for the construction and operations phases.
		  ○ Determine whether training for community members and workers on communicative diseases is necessary and implement if needed (to be determined by the CLO).
			EPC Contractor (subcontractors)	Construction phase	Worker Code of Conduct
					Vetting of security guards
					Training logs/ attendance sheets
					Signs in place
					Meeting minutes/ attendance sheets
					Number of grievances received

Labour wellbeing	All works	• Require contractor (via EPC Contract) to conform to Company Human Resources (HR) Policy, Code of Ethics, Policy Against Bribery and Corruption, Recruiting Policy, Supply Chain (Procurement) Policy, and Communication Policy. • EPC Contractor and Tier 2/3 sub-contractors to demonstrate functioning HR policies to meet with Lender requirements, ILO core conventions and Bulgarian law in contractor contracts.	EPC Contractor (subcontractors)	Construction phase	Workforce CMP Worker contracts Training logs/ attendance sheets

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		• Define manpower requirements for the construction and operation phases for the EPC contractor and subcontractors, and the O&M contractor including the number of E&S personnel and their qualifications. • Perform a supply chain due diligence or obtain third-party supply chain due diligence reports to verity potential suppliers' credentials regarding the occurrence of forced labour, child labour or occupational health and safety failures. The supply chain will be mapped (to the polysilicon level) and verified by an independent consultant for point of origin. • Suppliers shall have a system to identify and manage risks associated with child labor, forced labor, occupational health and safety and pollution prevention for their activities and their core supply chain. • Provide workers with a safe and healthy work environment Develop and implement a workforce MP during the pre-construction and construction phase which will include measures required by IFC PS 2 for the economy, employment and livelihood component: • Collaborate with the State Employment Offices • Collaborate with local institutions (municipality and administrative units) • Put in place transparent and fair recruitment procedures • Strictly follow the Bulgarian Code of Work requirements • Adopt and maintain human resources policies and management systems or procedures with the requirements of IFC PS 2 and national law. These policies and procedures will be understandable and accessible to workers, and in the main language(s) spoken by the workforce. HR policies and management will ensure: o Non-discrimination and equal opportunities to all workers o Compliance with national laws and international standards regarding employment of minors o Avoidance of any form of forced labour and child labour o Provide clear and transparent information on wages, benefits and working conditions o Provide workers with a safe and healthy work environment o Use an international workforce for a term-limited period for compliance and training purposes, where national personnel cannot be sourced. • Prepare a Worker Accommodation Management Plan • Provide equal training for men and women • In field training during the development of implementation phase, also through contractor/s and sub-contractors • Clearly indicate the positions/opportunities is for both men and women • Provide a women friendly working environment • Ensure all workers on the Project have a written project contract that clearly specifies their terms of employment, consistent with the local labour law and the IFC PS2. The terms of employment should be largely similar for all categories of the Project workers. • EPC contractor and subcontractors to provide contract templates for review to ensure their overall compliance with the applicable labour standards.			Grievance mechanism Number of grievances received Labour statistics

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		• Ensure that both migrant and local workers are engaged on substantially equivalent terms and conditions. • Provide an HR onboarding for all workers and explain the contract terms as per EBRD PR2. • Establish a Code of Conduct – Workers, including Workforce Grievance Mechanism (WGM) and ensure confidentially and anonymity where required. The WGM shall be open to employee and non-employee workers. Ensure that all workers directly and indirectly employed are informed on how to submit grievances. • Ensure appropriate welfare provisions (water, shelter, sanitary facilities, food) at the Site. • Ensure all workers receive the appropriate training as per the training need analysis and matrix developed under the ESMS (note specific requirements for working within a substation or on live equipment). • Undertake daily toolbox talks at all work fronts. • See also requirements under Emergency Preparedness and Response. • Provide all workers with notification of the duration of their contract at the start of work. • Develop labour reporting statistics for all workers, including identifying labour statistics per worker category (local, regional, international) and the split between male and female workers.			
Emergency preparedness - general	All works	Develop EPRP in accordance with Project Company EPRP (010) and with the following minimum requirements: • Identification of the emergency scenarios. • Specific emergency response for each situation relevant to the Project. • Emergency contacts and communication systems/protocols (including communication with affected communities when necessary). • Outline of medical facilities and services required on-site in a Medical Services Procedure and a Casualty Evacuation Procedure. • Outcomes of assessment of local emergency services capabilities and identify gaps that may need to be filled with site-based emergency response capabilities in the form of a “capacity assessment” appended to the EPRP (for approval). • Procedures for interaction with government authorities (emergency, health, environmental authorities), including names and contact details. • Site plan indicating requirements for permanently stationed emergency equipment and facilities (e.g., first aid stations, firefighting equipment, spill response equipment and personal protective equipment (PPE) for the emergency response teams). • Minimum requirements for trained medical professionals on-site, including first aid stations • Develop protocols for the use of emergency equipment and facilities. • Ensure clear identification of evacuation routes and Assembly Points (AP) for each work location highlighted on a site plan. • Identification of training requirements for all employees and third-party providers. • Emergency drills and their frequency are based on assigned emergency levels or tiers and an implementation schedule.	EPC Contractor (subcontractors)	Construction phase	EPRP Site medical services in place Drill reports

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		• Emergency Drills to include government/municipality emergency, health, environmental authorities wherever possible • Establish a site clinic to provide emergency first aid to employees capable of providing first aid response to electrocution, falls from height, etc. • Develop medical evacuation procedures to the nearest A&E facility.			
Emergency preparedness – climate risks/natural hazards	All works	• Undertake continuous monitoring (weather apps are OK) of weather events to enable an early warning of any high winds, storms, lightning, dust storms, or extreme precipitation to enable workers to get to shelter. • Establish worker emergency shelter protocol at the Site and protocols for extreme heat stroke cases. • During periods of high wind (30km/h+), dust-generating activities will not be permitted. • Provide all workers with dust masks in the event of a localized dust event. • Ensure sufficient supply of potable water at the work fronts (>3.5 L per worker per day). • Ensure sufficient shelter/shade during summer months. • Provide extra rest periods for workers when temperatures exceed 35°C. • Change the shift hours in line with the cooler hours. • ~~Ensure workers are not penalised for taking extra rest breaks during periods of extreme heat~~. • Erect temporary shade at all work fronts for all workers.	EPC Contractor (subcontractors)	Construction phase	EPRP Worker emergency shelters

Emergency preparedness – Spill response		• Prepare Spill Response Plan (may be part of the EPRP) and include appropriate training and requirements for spill prevention and cleanup equipment including:
		  ○ Use barriers (e.g., drip trays) to minimise impacts from spills or other potential leaks.
		  ○ All chemicals, fuels, and oils are stored at the construction camps and laydown area to be in designated areas in a secure and bunded facility.
		  ○ No herbicide uses.
		  ○ Do not refuel except at a dedicated refuelling area.
		  ○ All concrete washout to take place at designated concrete washout area only.
		  ○ All cement trucks must return to the batching facility or a dedicated wash-out facility to perform cement washout.
		• Works with hazardous liquids must be performed over an area of hardstanding to avoid seepage to groundwater in the event of a spill.
			EPC Contractor (subcontractors)	Construction phase	EPRP – Spill response procedure

Security	Site/ROW/Accommodation	• Perform a Project Security Risk Assessment (SRA) Develop Security Management Plan in accordance with Project Company Security Management Plan (008) including the following: • Security arrangements roles and responsibilities • Site access (project personnel identification, visitors identification vehicles identification etc.) • Project security approach and systems, e.g., security barriers, fences, gates, locks, fortifying facilities, and means of access control • Accommodation security • Security-related communication arrangements	EPC Contractor/ Security contractor	Construction phase	Project SRA EPC Security Management Plan Security Code of Conduct Training logs/ attendance sheets

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI

		• Interface with host government agencies and public security forces
		• Provisions to ensure compliance with regulations and good industry practice regarding:
		  ○ Security personnel selection, vetting and employment
		  ○ Security personnel rules of conduct,
		  ○ Security personnel equipment, uniform
		  ○ Requirements for training of security guards on human rights and use of force, weapons handling (if needed), human rights and receipt of grievance
		  ○ Monitoring of compliance and investigation process of non-compliance acts
		• Security training program including:
		  ○ Security Code of Conduct (to be signed by all security personnel)
		  ○ Voluntary Principles on Security and Human Rights
		• Grievance mechanism			

Safeguarding community members and workers against communicable diseases (including COVID-19)	All works	EPRP include a procedure for managing communicable diseases, including but not limited to the following requirements: • Measures to minimize the risk of contamination of site personnel from outside the project site (and construction camp), particularly local workers not residing in the accommodation camp. • Measure to minimize the risk of transmission to the local community from site personnel. • Emergency procedure in case of positive cases or outbreak (for affected personnel and potentially affected personnel). • Procedures for managing the risk of transmission to the local community (especially the management of mixing workers from the community with those housed in workers' accommodation). • Provide PPE to reduce the risk of spreading COVID-19, such as masks and hand sanitizer (as needed).	EPC Contractor/ Security contractor	Construction phase	EPRP

MITIGATION AND MANAGEMENT COMMITMENTS – OPERATION PHASE

Objective	Activity	Action	Responsibility	Timescales	Evidence
Compliance with national requirements	O&M works	• Obtain operational environmental approval prior to the start of operation	Project Company	Pre-operation	Operations Permit
Implement ESMS in line with ISO14001 (environment) and ISO45001 (health and safety).	O&M works	• Ensure ESMS includes relevant requirements for E&S and H&S-related training, communication, monitoring, reporting, accident incident reporting, auditing, management review, and continuous improvement.	Project Company	Annually	Annual ESMS audit
Operational management planning	O&M works	• Implement operational ESMS to implement operational ESHS management requirements of the Project. • Develop Project O-ESMP. • Ensure grievance mechanism is disclosed in project areas • Maintain regular stakeholder engagement, at least annually. • All maintenance work to have a specific risk assessment addressing waste, climate risks H&S, hazardous material management, emergency preparedness and response, and traffic risks) • Implement waste management practices in line with O-ESMP and ESMS • Ensure correct PPE at all times • Adopt approach to maximise “local” hiring. •	Project Company O&M contractor	Annually	Project O-ESMP Annual reporting GM Log SE Log Risk Assessments (maintenance works) Waste documentation
Occupational Health and Safety	O&M works	Establish Occupational Health and Safety (OHS) Management Plan requiring: • Management measures for dust, occupational noise, falls from height, electrocution risks etc. • Define workplace protocols for maintenance activities. • Employ EHS officer to oversee Project Company obligations (may be based off site). • Update the emergency preparedness policy and emergency preparedness and response plan for the operations phase. • Disclose updated emergency preparedness and response plan to local emergency services and other relevant external stakeholders (e.g., nearby communities). • Perform continuous monitoring of storm events: e.g., site lock-down securing all equipment and materials. • Site risk assessment for all tasks to be undertaken on the Site. • Communicate hazards and risks to all workers during setting-to-work briefings. • Mandatory PPE, including steel-toe capped boots, overalls, hard hat, hi-vis vest, safety glasses, hard hat AND ear protection, gloves, and dust masks for specific tasks (e.g., welding). • Worker Induction Program. • Worker Code of Conduct. • Training to all workers. • OHS inspection and audits and ensure there is a corrective action process.	O&M Contractor Project Company	Construction phase	Occupational Health and Safety Plan Risk assessment Worker Code of Conduct Worker Induction Program Training logs/ attendance sheets Audit reports Incident reports

Objective	Activity	Action	Responsibility	Timescales	Evidence
		• Reporting occupational accidents, diseases, and incidents.			
Protect community health and safety	O&M works	• Maintain Worker Code of Conduct to be read and signed by all workers on the contract during the induction process. • Security personnel to not be armed unless prior approval from Project Company • Ensure the security plan includes requirements for vetting security guards, training on using force, security guard code of conduct etc. • Employ local security guards and female guards where possible. • Maintain CLO and Community Grievance Mechanism (as developed during construction phase) • Provide targeted training (including life skills such as leadership and decision-making) and awareness-raising to vulnerable workers such as women.	O&M Contractor Project Company	Operations phase	Code of Conduct Security Plan CLO in place Community Grievance Mechanism
Labour wellbeing	O&M works	• Require contractor (O&M contractor) to conform to Company Human Resources (HR) Policy, Code of Ethics, Policy Against Bribery and Corruption, Recruiting Policy, Supply Chain (Procurement) Policy, and Communication Policy. • Contractors to demonstrate functioning HR policies to meet with Lender requirements, ILO core conventions and Uzbek law in contractor contracts. • Ensure all workers on the Project have a written project contract that would clearly specify their terms of employment, consistent with the local labour law and the IFC PS2. The terms of employment should be largely similar for all categories of the Project workers • Implement Worker code of conduct • Establish a Workforce Grievance Mechanism (WGM)and ensure confidentially and anonymity where required. • Ensure appropriate welfare provisions (water, shelter, sanitary facilities, food) at the Site. • Ensure all workers receive the appropriate training as per the training need analysis and matrix developed under the ESMS, including training on the WGM (note specific requirements for working within a substation or on live equipment). • Develop labour reporting statistics for all workers, including identifying labour statistics per worker category	O&M Contractor Project Company	Operations phase	HR Policy and associated documentation Labour contracts with all employees Workers Grievance Mechanism Labour statistics maintained Training records
Emergency preparedness - general	O&M works	• Review and update EPRP for operation phase • Undertake continuous monitoring of weather events to enable an early warning of any high winds, storms, dust storms, or extreme precipitation to enable workers to get to shelter	Project Company O&M Contractor	Operations phase - ongoing	Monthly O&M reporting
Security		• Updated Security Management Plan	Project Company O&M Contractor	Operations phase - ongoing	Monthly O&M reporting

Objective	Activity	Action	Responsibility	Timescales	Evidence
Ensure rehabilitation of disturbed areas is successful.	O&M works	• Implement the rehabilitation requirements of the biodiversity management plan requirement for habitat restoration for no-net loss. • Monitor outputs	Project Company	Operations phase – 5 years or as necessary	Monthly O&M reporting
Ensure livelihoods are not adversely impacted in the long-term	O&M works	• Monitor impacted households for at least one years to ensure they have at least returned to their previous level of livelihood, if not improved their livelihood. • Monitor the implementation of livelihood restoration activities.	Project Company	Operations phase	Monthly O&M reporting Annual M&E report (livelihoods)
Biodiversity	O&M works	• Keep all movements to main asphalt roads wherever practicable • Reduce maintenance work for vegetation around and beneath the panels (often used as a refuge by reptiles, amphibians, invertebrates)	O&M Contractor	Operations phase	Monthly O&M reporting
Stormwater/flood management	O&M works	• A stormwater management plan shall be developed, and an internal drainage system shall be designed as part of the project design based on hydrological and flood studies to reduce the risk and mitigate the impact of potential floods.	O&M Contractor	Operations phase	Storm water management plan
Waste management plan	O&M works	• The O&M contractor will develop a Waste Management Plan in compliance with Bulgarian legislation and GIIP that will also include measures to ensure: • Food/organic waste and recyclables, such as paper, plastic, scrap metal waste, etc. must be appropriately segregated and stored in designated waste bins/containers and periodically deposited in approved disposal areas or sold to licensed recycling companies. • Ensure electrical waste (consumables, spare parts and obsolete equipment) and broken solar panels are adequately packed and sent back to the manufacturer or reused in other forms and locations • Generated waste quantities - must be recorded in a separate/dedicated register according to the type of waste and the quantities generated. During the waste transfer process, a waste transfer format (Waste Transfer Format) shall be filled out to determine the respective quantities according to the type of waste leaving the site and the name of the company/entity that will handle these wastes. The Developer shall regularly keep waste data during the operation activity and present/report to the government authorities if required. • Conduct continuous training and education awareness of all project employees regarding waste management practices to avoid and reduce the risks of waste generation and potential impact during the operation phase.	O&M Contractor	Operations phase	Waste management plan

ATTACHMENT 3: MONTHLY ESHS REPORT (TEMPLATE)

- Executive Summary
- Health, Safety, Environment and Social (HSES)
- EPC HSES documentation development status
- Personnel
- ESHS Training

EPC Contractor ESHS training activities during the reporting period:

Content	Total Sessions	Total Trainees	One Session Time/Minutes	Total Training Man hours
HSES Induction				
GBV initiatives/awareness training				
HR induction				
Mechanical injury training				
Fire training				
Total	35	208	60	208

- HSES Incidents
- ESHS Audit
- Emergency drill
- PPE

Social Components

- Labor – main figures
- Labor - Social grievances placed by workers

Stakeholder Engagement

Engagement type	Purpose	Stakeholder name /Group	Date

Social incidents

- Community grievances
- Number of new grievances:
- Description of new grievances:
- Number of open grievances:
- Number of closed grievances:
- Total number of grievances from project start:

- Worker's grievances
- Number of new grievances:
- Description of new grievances:
- Number of open grievances:
- Number of closed grievances:
- Total number of grievances from project start:

Grievances addressed to EPC and subcontractors (except grievances placed by workers)

- Number new grievances:
- Description of new grievances:
- Number of open grievances:
- Number of closed grievances:
- Total number of grievances from project start:

Status of the ESAP

Status	Satisfied (green actions closed reporting period)	Pending	Not Due

Status of E&S Permits

- Permits received during the reporting period:
- Permits required for the next reporting period:

Reporting

- GHG reporting

Type of fuel and Electricity	Monthly 2024 (quantities according to fuel type)	Cumulative[14]	GHG emission[15] (tones CO_2EQ)
Scope 1 emissions			
Fuel (Machinery) – gasoline (L)			
Fuel (generators) – gasoline (L)			
Transport vehicles fuel use – gasoline (L)			
Fuel (Machinery) –diesel (L)			
Fuel (generators)- diesel (L)			
Transport vehicles fuel use –diesel (L)			
Natural gas (m^3)			
Scope 2 emissions			
Electricity consumed (MWH)			

- Hours

COMPANY		MANPOWER	HOURS
Company (			
HE			
Subcontractor (X			
Subcontractor (X1)			
Subcontractor (X2)			
TOTAL			

[14] Accounting started from December 2023.

[15] Cumulative GHG emission

2.13.1 Labor indicators

Project employees in this month	Gender				Age				Number of workers employed from Shirin	Number of workers employed from Bayavut	Number of workers employed from Syrdarya Region	Number of workers employed from Uzbek	Number of workers employed from China and other countries	Total:	Hours:
		Men	Women	Total	Age	Under 25 Years Old	25 years old and above	Total							
	Number				Male										
	%				Female										
	Number				Male										
	%				Female										
	Number				Male										
	%				Female										
	Number				Male										
	%				Female										
	Number				Male										
	%				Female										
	%				Female										

- HSE statistics

Health and Safety Indicators	MONTH	Cumulative to Date
Fatalities		
Lost Time Injuries (LTI)		
Days Lost – LTI		
Restricted Work Cases (RWC)		
Days Replaced by RWC		
Medical Treatment Cases (MWC)		
First Aid Cases (FAC)		
Near Misses (NM)		
Number of HSE Exercises/Drills		
Number of Health and Safety Inspections		
Number of Health and Safety Weekly Walkdowns		
Unsafe Acts		
Unsafe Conditions		
Number of RCA (root cause analysis) Completed		
Number of RCA (root cause analysis) Outstanding		
Road Traffic Accidents (RTA)		
Property Damage (except RTA's)		
Environmental Incidents		
Number of Hours Worked from NTP		
Number of Hours Worked from LTI		
EHS Specific Training Attendees		
EHS Induction Training Attendees		
Toolbox Talks		
Toolbox Talks Attendees		

- ESHS non-compliances[16]

- ESHS non-conformances[17] at site

NCR No.	Title	Raised items	Status of non-conformances
1			
2			
3			
4			
5			
6			
7			

- Observation / Findings Report

Number of issued OFR's	Raised issues	Closed issues	Open issues

- Observations/Findings statistic

- Monthly ESHS Audit statistics

Month	Findings	Closed	Open	Conducted

- Monthly Labour Audit statistics

Month	Findings	Closed	Open	Conducted

16 Non-compliance – non-compliance can result in revoking permits and legal action;

17 Non-conformance – fails to meet Project requirements, regulations and standards, which comes from Daily Observations, Monthly ESHS and Labour Audits.

ATTACHMENT 4: COMMITMENTS REGISTER

ST GEORGE SOLAR PV COMMITMENTS REGISTER (FINAL 31 JULY 2024)

MITIGATION AND MANAGEMENT COMMITTMENTS – DESIGN / PRE-FC PHASE

Objective	Activity	Action	Responsibility	Timescales	Evidence
Avoid significant impacts on sensitive receptors from the construction works.	Design / EPC Contractor Technical Specification	• Incorporate GIIP engineering controls in Project design. • Grade temporary access roads so their slope is not too large to avoid the build-up of fast-running runoff water during extreme precipitation events. • All equipment to ensure less than 85d(B) A at 1m from the equipment (outside) or required noise barriers or worker protection to be provided. • No noisy or high noise activities to be undertaken outside normal working hours (7am to 6pm) without prior approval of the Project Company. • Design lighting that is activated to work only during movement and the emitted light should be outside the ultraviolet spectrum if possible - for some types of insects, amphibians and reptiles, this can reduce their barrier effect or disorientation in space. For nocturnal birds of prey, it will reduce the element of anxiety • Design of the route of the OHTL to avoid health risk for the public and ensure the OHTL does not pass directly over any residential property • Adopt tension stringing technique to avoid impact on soils between the towers and stringing points • Ensure the drainage system includes a containment system for collecting intermittent contaminated wastewater streams, and water from abnormal operating scenarios. • Exclude access routes which requires routing through the village of Polkovnik Lambrinovo unless there are exceptional circumstances	Contractor (detailed design)	Pre-FC[1] Pre-NTP[2]	EPC Contract[3] EPC approved Design
Confirm baseline data	Owner	• Perform baseline photographic survey of buildings (immediately adjacent to road) and road condition along R218 and local road. • Perform soil quality analysis in key excavation areas. •	EPC Contractor	Pre-construction	Road and building condition report Soil contamination report
Address climate resilience measures in the technical design	Design / EPC Contractor Technical Specification	• Design project for climate projections up to 2085 – consider the need to reinforce the structures or higher design standards (stronger winds, higher temperatures). • Design access roads to consider short-term, extreme weather events. • Design any drainage to account for increased or short-term extreme precipitation patterns. • Design for increasingly frequent and extreme dust storms.	Company Contractor (subcontractors)	Pre-FC Pre-NTP	EPC Contract Technical Specification) EPC approved design
Reduce the use of raw materials/ potentially finite and or scarce resources.	Design / EPC Contractor Technical Specification	• Substitute raw materials or inputs with less hazardous or toxic materials wherever economically and technically feasible. • Identify opportunities to prevent waste production in the first instance. • Dry robot cleaning for PV panels. • No groundwater is to be used in the construction process.	Contractor (subcontractors)	Pre-FC Pre-NTP	EPC Contract Approved Design Water Resource confirmation

[1] Pre-NTP – Pre-Notice to proceed.

[2] Pre-FC – Pre-Financial Close.

[3] In this table, reference to "EPC Contract" refers to the inclusion of this requirement as a specific contract obligation in the EPC contract. Implementation of these requirements will be monitored during construction and operation as relevant (and noted in subsequent tables).").

Objective	Activity	Action	Responsibility	Timescales	Evidence
		• All drinking and potable water will be tankered to the Site from a sustainable source or from existing mains municipal water. • No water can be extracted from nearby surface water in S-L Protected Area. • Use septic tanks on Site for wastewater management.			
Ensure biodiversity mitigation measures are incorporated into the design	Design / EPC Contractor Technical Specification	• Maintain a 250 m setback from the S-L Protected area to any temporary storage area, laydown area. • Select fencing that allows access areas/passages through which rabbits, foxes, jackals, land turtles and other small species can pass. As the size of the opening must be not less than 40/40 cm for every 100 linear meters of length of the fence along its entire perimeter	Company Contractor (subcontractors)	Pre-FC Pre-NTP	EPC Contract Approve Design
Hazardous materials and waste	Design / EPC Contractor Technical Specification	• Project contracts obligate the Project PV panel suppliers to remove panels for recycling. • Identify recycling options for waste, such as any electric waste, broken PV panels/modules, packaging waste, etc., through authorized/ licensed waste management companies. • Ensure selected PV modules include all costs for returning and decommissioning PV panels (intermittently during operation and end of life). • Prohibit the following materials in EPC Contract: o Asbestos o PCB-containing materials. o lead-based paints o pesticide, and herbicides defined under the Stockholm Convention. o Undertake due diligence of the WWTP in Silistra for alignment with GIIP.	Company Contractor (subcontractors)	Pre-FC Pre-NTP	EPC Contract Approve Design
Safeguard workers and community from an emergency or abnormal events	Design / EPC Contractor Technical Specification	• The Project will have a dedicated Emergency Preparedness and Response Plan (EPRP) in place.	Company EPC contractor (subcontractors)	Pre-FC Pre-NTP	EPC Contract Approve Design
Safeguard the well-being and improve the living standards of those whose livelihoods are involuntarily displaced (OHTL)	Complete implementation of the Livelihood Restoration Plan	• Ensure all compensations prior to the commencement of the construction activities • Make all supplementary compensation payments as required in the LRF prior to construction of OHTL • Start (and complete, if possible) any livelihood restoration activities as required in the LRF before site clearance.	Project Company	Pre-construction	Evidence of compensation paid. LRP Monitoring Report Compliance report Close out report
Promote local hiring	EPC Contract	• Unbundle procurement contracts so that local community members have a greater chance of supplying the Project and advertise employment and procurement contracts locally and in local languages. • Set target of at least 15% local participation (Bulgarian). • Confirm Silistra District communities will be considered 'local' for the purpose of local hiring. • Adopt approach to maximise “local” hiring itoupskill workers to conduct semi-skilled work on site. . • Discuss with Local community leaders and local communities the employment and procurement contracts available to manage expectations of the number of local jobs that will be available. • Prioritise employment of local community members where possible. • Prioritise employment of PAPs or members of their families where possible.	Project Company	Pre-construction	EPC Contract

Objective	Activity	Action	Responsibility	Timescales	Evidence
		• Prioritise procurement of goods from local communities where possible. • Where possible, prioritise women's employment and people from vulnerable groups.			
Promote local provision of goods and services	EPC Contract	• Where practicable (i.e., suppliers are competitive and can meet the technical requirements which need to be achieved), the Project Company (and their contractors) will seek to procure materials and services from companies based in the neighbouring locations to ensure that positive effects of using local companies are experienced as close to the Project site as possible to enhance positive benefits of the Project for local communities. This includes SMEs owned by women which shall be identified by the Company during the Project execution stage. Details will be included within the Contractor and Supply Chain Management Plan.	Project Company EPC Contractor	Pre-construction	EPC Contract
Safeguard local community from worker influx.	EPC Contract	• All accommodation (onsite or off-site) must comply with "Worker's Accommodation Processes and Standards": Guidance Note by IFC and EBRD. • House workers from outside the area from the direct AOI in accommodation away from the immediate communities as much as possible, thereby reducing potential social tensions. • Community grievance mechanism provided in locations where worker accommodation is provided in local communities. • Do not allow contractors to use at-the-gate hiring or day labourers.	Company Contractor (subcontractors)	Pre-FC Pre-NTP	EPC Contract Approve Design

MITIGATION AND MANAGEMENT COMMITMENTS - PRE-MOBILIZATION PHASE

Objective	Activity	Action	Responsibility	Timescales	Relevant Management Plan / Monitoring / KPI
Comply with national permit requirements.	Environmental permits Labor permits Construction permits Transportation permits	• Develop Permit Register (name, phase, requirements, and lead) and set out conditions register.	Project Company / EPC Contractor	Pre-construction	Permit matrix – monthly updates
Pre-mobilisation biodiversity surveys	Pre-site clearance	• Check for introduction of species included in the list of invasive and potentially invasive alien species (of higher plants for Bulgaria, indicator SEBI10 - Invasive alien species for Europe (source EAES http://eea.government.bg/bg/soer/2010/biodiversitv-nem/biologichno-raznoobrazie-natsionalna-ekologichna-mrezha-1) • Apply a rotation scheme on small areas moving from east to west to remove vegetation around the PV facilities - panels, inverters and others in accordance with the instructions of an ecologist/biologist, as a result of monitoring (before starting removal activities of vegetation). This will enable species from the groups of amphibians, reptiles, mammals and partially from invertebrates to move to neighbouring territories and limit disturbance and possible mortality • Remove amphibians or reptiles from the areas intended for construction, in accordance with the construction scheme.	Owner+EPC Contractor	Pre-mobilisation	Biodiversity survey plan (prior to survey) Biodiversity survey report (post-survey)
Pre-mobilisation roads condition survey	Pre-construction	• Undertake a survey of the condition of the local roads that will be used by construction traffic and record details. Identify areas where work may be required to improve quality/make roads suitable for construction traffic.	EPC Contractor	Pre-mobilisation	Survey report
Pre-mobilisation	Transportation routes, risk assessment and traffic counts	• Undertake transportation route risk assessment for any abnormal loads	EPC Contractor	Pre-mobilisation	Traffic risk assessment and traffic count report
Implement robust ESMS for the duration of the Project	Site implementation from NTP to COD	• Prepare the Owner ESHS Management • Establish the EPC-ESHS Management Plan	Project Company EPC Contractor	Pre-Financial close Pre-Construction	C-ESMS EPC-ESMS
Demonstrate contractor capacity to implement the E&S requirements for the Project.	Organization	• Populate Project Company Project Implementation Team (as per section 3.0 of ESMP) • Define Contractor Project Implementation Team (as per section 3.0 of ESMP)	Project Company / EPC Contractor	Pre-mobilization	Sponsor organogram (approved by Lenders)
Ensure a transparent and robust supply chain	Supplier selection	• Unbundle procurement contracts so that local community members have a greater chance of supplying the Project and advertise procurement contracts locally and in local languages. • Perform panel supply chain due diligence or obtain third-party supply chain due diligence reports to verify potential suppliers' credentials regarding the occurrence of forced labour, child labour or occupational health and safety failures. The supply chain will be mapped (to the polysilicon level) and verified by an independent consultant for the	Project Company / EPC Contractor	Pre-mobilization	Panel procurement DD (performed by Company affiliate). Supply Chain and Local Employment and Procurement (see Appendix C)

Objective	Activity	Action	Responsibility	Timescales	Relevant Management Plan / Monitoring / KPI
		point of origin. For all other materials adopt the Company Supply Chain and Procurement Policy that includes the following obligations: ○ Prohibit forced labour at the Site and in the supply chain. ○ Prohibit the hiring of child labour at the Site and in the supply chain. ○ Preference for using local suppliers where possible. ○ Maintain an employee register. ○ Preference suppliers who remove packaging waste for ultimate disposal (following Uzbek regulations and transboundary waste disposal obligations)			
Promote the use of local workers on the Project	Procurement of local labour and contractors	Develop Local Hiring Procedure as part of the Labour and Working Conditions Plan including: • Workforce requirements for the construction and operation phase for Company, the EPC Contractor and subcontractors, including the number of E&S personnel and their qualifications. • Key competencies for all roles with plenty of notice to mobilize local recruitment. • Hiring needs. • Local counterparts for advertising project needs (skilled and unskilled workers) may be sourced from the local labour pool. • Mechanism for promoting women working on the Project. • Prioritise local unskilled/semiskilled local employees. • Definition of working terms and conditions (salary, etc.) for each role on site. • Nominate an EPC Contractor HR manager to oversee employment matters on the Project.	Contractor (subcontractors)	Pre-mobilization	Local Hiring Plan (accepted by Project Company) EPC Contractor HR manager
Implement good international industry practice (GIIP) for site management and coordination.	Notification of works	• Following GIIP undertake the following: • Plan and give regulators advanced warning of potential problems and the start of work. • Always display on Site the emergency number for regulators and local community leaders at key worksites. • Ensure site personnel know the correct procedure for reporting incidents	EPC Contractor	Pre-mobilization	Monthly update via the PIT
	Managing sub-contractor mobilization)	• Follow IFC Good Practice Guidance note: Managing Contractors Environmental and Social Performance (section 4.5) including: • Sub-contractors should provide work completion certificates and EHS certificates to prove their past environmental performance before hiring. • Ensure subcontractors have a copy of the Project ESMP and Owner ESHS Management Sub-plans and EPC-CMPs as part of the tender process. Ensure sub-contractors attend environmental training/induction sessions (communicated to workers in their main language(s) spoken). • Audit the performance of sub-contractors during the Project. • Adhere to the local hiring policy (see below) for prioritizing local contractors.	Contractor (subcontractors)	Part of the contractor tender process	Proof of checks, training records Site inspection records HR policies approved by EPC Contractor

Objective	Activity	Action	Responsibility	Timescales	Relevant Management Plan / Monitoring / KPI
		• Require sub-contractors to provide a copy of their HR policy for approval, or they commit to following the EPC Contractor's/ Project Company HR policy that meets Lender and ILO requirements and prohibits explicitly child and forced labour use, OHS management and encourages non-discrimination.			
	Management and site control	• Nominate a person within Contractor's organization with defined responsibility for the ESHS role in Project. • All method statements to include ESHS requirements. • All PTW forms to include reference to ESHS (including community and climate risks). • Through relevant training, ensure everyone on Site is aware of their responsibilities and liabilities with respect to the environment and social responsibility. • Through site induction, inform staff and visitors of Project environmental issues and standards (including labour, climate, ESHS and security risks). • Display warning signs at key work sites prominently • Make Project Company environmental policy available to all on Site	EPC Contractor	Throughout project works	Successful third-party audit (Project Company)
		• Protect primary work sites against vandalism, theft, and breakage with permitter fence (a temporary permitter fence must be erected if the permanent site fence is not erected at mobilisation) • Define responsibilities for site's security in a Security Management Plan (as defined below) while the services are being performed. • Secure the Project boundary with a secure fence.	EPC Contractor		
	All Site works	• Establish a safe working environment with an occupational health and safety (OHS) plan that addresses potential hazards, identifies preventive and protective measures, including training and use of PPE, and describes documentation and reporting of accidents, diseases and incidents. • Where possible, the storage of materials should be carried out only in areas around the airport runway	Contractor (subcontractors)	Throughout project works	OHS Plan
	Liaison with the local community	• Identify the key local representatives and inform them of the Project's progress. • Nominate a community point of contact in the Contractor team and Operations team (Contractor social officer) • Display a contact board at the perimeter of key work sites stating contact details in case of a complaint or comment. • Use this board to display information about project phasing and other relevant matters. • Implement the requirements of the grievance mechanism and stakeholder engagement plan (SEP) • Deal with any grievances that arise quickly and follow the defined grievance procedure. • Create a log of grievances and ensure they are appropriately followed up and resolved.	Project Company CLO	Start of Site works – ongoing after that.	Monthly audits Communication records CLO Daily Site walk around Grievance logs Number of complaints

Objective	Activity	Action	Responsibility	Timescales	Relevant Management Plan / Monitoring / KPI
Ensure general site housekeeping and environmental protection	Daily and weekly site inspections of permanent work sites	• Work sites will be subjected to “walk-round” site inspection by the contractors’ EHS management staff daily.	EPC Contractor (oversight by Project Company)	Throughout project works	Site inspection records Number of complaints Target zero
Asbestos	Asbestos containing material (ACM) risk assessment	• Undertake ACM risk assessment to determine the likelihood of ACM being present in the remaining and former airport buildings (construction waste). • If ACMs are identified, an ACM Management and Disposal Plan shall be developed, and appropriate ACM waste disposal shall be undertaken.	EPC Contractor (oversight by Project Company)	Prior to construction	ACM risk assessment report / ACM Management and Disposal Plan
Noise	Establish baseline at all nearest noise sensitive receptors including along transportation route	• Supplement noise baseline in Polkovnik Lambrinovo at the nearest sensitive receivers. The noise level will be measured near the nearest house or other sensitive receptor in Polkovnik Lambrinovo (minimum of 2 points) and at the access road of the PV plant from road 218 during the material transport activities and compared to the admissible limits. Monitoring locations will be recorded to allow repeat monitoring if required	Project Company	To be completed before start of construction	Noise baseline report
Vibration	Conduct photographic survey of properties along the R218 and “local access road”	• Obtain photographic baseline along R218 and “local road” in case of complaints or instances of dilapidation which may be attributed to the	Project Company	To be completed before start of construction	Road and property condition report

MITIGATION AND MANAGEMENT COMMITMENTS – CONSTRUCTION

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
Minimise dust generation within the direct AOI (250m from the works)	Earthworks, material handling (measures to control dust from vehicle activities described under traffic and transportation) (C&D) Infrequent maintenance activities (O&M).	As part of the Environment, Pollution Prevention and Control CMP, develop procedures for the implementation of the following GIIP and the requirements of the Project Owner **Pollution Prevention and Control Plan**: • Locate activities and rock/earth stockpiles more 250m from the S-L Protected Area. • No plant or equipment to be stored less than 250m from the L-S Protected Area • Construction Traffic Management Plan (CTMP) to incorporate all relevant mitigation measures for vehicle movement nearby and within the project areas • Use off-site concrete batching off-site for all concrete needs. • Minimise stockpiling of soil and earthen material through coordination of earthworks and excavation activities (excavation, grading, compacting, etc.) • Demarcate work areas and access roads. • Cover, seed, or fence stockpiles to prevent wind whipping. • Keep stockpiles for the shortest possible time. • Consider the prevailing wind direction when siting stockpiles to reduce the likelihood of affecting sensitive receptors. • Burning of any material anywhere on the Project construction sites is strictly prohibited • Minimise amounts of material handling and avoid double handling. • Minimise open excavation areas • Seal or re-vegetate completed earthworks as soon as reasonably practicable after completion. • Ensure all vehicles carrying loose or potentially dusty material are fully sheeted to or from the Site. • Cement and other fine powders will be sealed or put in bunded containers after use. • Regular (daily) visual monitoring of dust episodes, soiling of vegetation, dust resuspension on the roads and dust clouds. • Minimise vegetation clearance (when is possible) to reduce exposure of bare soil, and revegetate cleared areas as soon as possible • Re-vegetate areas as soon as possible. • Provide workers with relevant PPE, including dust masks. • Require all contractors to have an on-site area for shelter during dust events. • Construct new road sections following site clearance and stockpile management requirements, including covering stockpiles to minimise dust events. • Maintaining cleanliness by removing dust from machines and vehicles must be a daily practice (sprinkling, vacuuming, cloths). • Excavation, handling, and transport of erodible materials shall be avoided under high wind conditions (>30km/h) • Use water (from a sustainable source) or other control measures such as chemical bonding agents or aggregate to control dust. • Demarcate delivery road and access tracks at the Site and ensure all workers stick to the demarcated area. • Record any exceptional incidents that cause dust, either on- or off-site, and the action taken to resolve the situation in the logbook.	EPC Contractor (subcontractors)	Construction	Site inspection records Community grievances
Minimize the impact of fugitive emissions from vehicle exhausts and equipment on receptors along with the direct AOI	Earthworks, material handling/vehicle movements	As part of the Environment, Pollution Prevention and Control CMP, develop procedures for the implementation of the following GIIP and the requirements of the Project Owner Pollution Prevention and Control Plan:	EPC Contractor (subcontractors)	Construction	Site inspection records Construction reports

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
and delivery routes up to the Material and Equipment Laydown Area.		• Use modern machines and equipment, which comply with the latest EURO standards regarding construction of new engines, emission control systems, considering the global trend of manufacturing engines with low fuel consumption on power unit and restrictive emission control. • Conduct periodic checks, according to the legislation in the field, for the machines and means of transport involved in the construction works, so that they are in good technical condition and do not emit exhaust gases beyond the permitted limits. • All construction machinery and equipment to be maintained in good working order • Monitor all engines and equipment that are turned off when not in use. • Locate machinery and dust-causing activities (e.g., access roads, stockpiles) away from nearby sensitive receptors where practicable and more than 250m from the S-L Protected Area. • Minimise movement of construction traffic around the Site (use demarcated routes only). • Keep vehicle movements to a minimum. • Enforce speed limits and reduce vehicle movements (maximum of 10km/h) for project vehicles on unsurfaced roads).			
Minimise noise emissions	Operation of site equipment	• Demarcate specific routes from the existing road to the right of way that maintain a buffer of at least 250m from NSR where possible. • Restriction of construction activities to daytime hours and weekdays • No noisy or high-noise activities are to be undertaken outside regular working hours (7 am to 6 pm) without prior approval of the Project Company • Select equipment with lower sound power levels • Install suitable mufflers on engine exhausts and compressor components • Install vibration isolation for mechanical equipment • Avoid simultaneous work activities that generate high levels of noise/ vibration emissions • Inform nearby dwellings on the timing and duration of works and when the noisiest stages will likely occur (ongoing through the process). • Plant and equipment are to be examined daily for defects before the start of work, and under no circumstances should defective equipment be used. • Acoustic covers on machine engines are to remain closed when in operation. • Avoid unnecessary revving of engines and equipment to be switched off when not in use. • Site operatives are to be briefed on keeping noise to a minimum. • No blasting without prior approval of the Project Company. • Locate static plant (e.g., generators) to take advantage of any screening to break the line of sight from receptors. • Brief site operatives to keep noise minimal as part of the induction process. • Following the SEP, inform receptors when work will commence and any particular noisy works. • Use the community grievance mechanism (CGM) to receive and process noise complaints.	EPC Contractor (subcontractors)	Construction	Site inspection records Construction reports
	Construction traffic	• Limit vehicle speeds on-site to a maximum of 20km per hour. • All vehicles to undergo regular maintenance schedules following national statutory requirements.	EPC Contractor (subcontractors)	Construction	Site inspection records Construction reports
Minimise waste generation	Construction PB/BESS/OHTL / substation	• Select PV panel suppliers that can ensure take-back and recycling of PV panels during the operation phase and end-of-life decommissioning. • Ensure selected PV modules and battery supplier contract includes all costs for returning and decommissioning PV panels (intermittently during operation and end of life). • Prohibit the following materials in EPC Contract / Procurement Policy ○ Asbestos	Project Company	Construction	Waste logs

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		○ PCB containing materials ○ Lead-based paints ○ Pesticides and herbicides as defined under the Stockholm convention. • Consider off-site manufacture and design for disassembly to minimise resource use.			
Minimise impact on water resources	Construction PV/OHTL / substation	• Construct the perimeter drainage system, to act as a cut-off drain to protect the S-L Protected Area during earthworks as set out in Pollution Prevention and Control Plan which includes the surface water management requirements. • Ensure the drainage system includes a containment system for collecting intermittent contaminated wastewater streams, from abnormal operating scenarios or during wet cleaning of panels (maximum of 4 times per year). • No storage or laydown areas within 250 m of the S-L Protected Area • No groundwater abstractions for potable or construction-related purposes. • Sanitary waste will be collected in portable latrines or septic tanks, and wastewater will be collected for disposal off-site in a municipal wastewater treatment facility (under licence). • Portable latrines or septic tanks must be installed at least 250m from the S_L Protected Area, with leak prevention and detection measures. • Undertake groundwork to ensure appropriate site drainage (avoiding risk of contaminated runoff) • No direct discharge or uncontrolled releases of potentially contaminated water to the ground, e.g., concrete washout or oily wastewater (see actions on spill control below). • Establish a controlled concrete washout area (on Site) (note – no concrete batching on site) • Areas where spillage of contaminants occurs should be excavated (to the depth of contamination) and suitably rehabilitated. If any other minor spillage occurs, it should be cleaned immediately, and the contaminated area should be rehabilitated. • The washing of Project vehicles in any surface water bodies in and around Project site(s) will be strictly prohibited. All Project vehicles should be washed at designated wash bays on site/s. These wash bays will include oil/grease and sediment traps for grey water. • Prevent any ad-hoc maintenance of vehicles/equipment in and around the Project site(s). All vehicles/equipment should be maintained at a designated workshop. The workshop will include an oil/grease trap. • Maintain all active work areas in a good and tidy condition; debris and waste should be contained in such a way that they cannot become entrained into surface run during periods of heavy rain. • The management of sewage should be taken over by a licenced contractor. • Provide hazardous waste storage areas with secondary containment. Moreover, hazardous waste should be stored in sealed/covered containers to prevent rainwater intrusion. • Provide all dangerous and hazardous material stores and handling areas with secondary containment capable of holding 110% of the total capacity of all tanks/vessels. • Confine the loading and unloading of dangerous and hazardous material to areas that are provided with secondary containment and in line with hazardous material handling procedures.	EPC Contractor (subcontractors)	Construction	Site inspection records Construction reports
Sustainable water use	Construction PV/OHTL / substation	• Drinking/potable and construction water will be sourced from the municipal supply and tankered to the Site (under permit). • All concrete will be delivered to the Site pre-mixed with approved water use licences. • Potable water should be obtained from a sustainable source (and not obtained from S-L Protected Area).	EPC Contractor (subcontractors)	Construction	Site inspection records Construction reports
Minimise impact from wastewater	PV Site/ROW clearance	The contractor will develop a Wastewater Management Plan in compliance with Bulgarian legislation, IFI Requirements and GIIP (good international industry practice) that will also include measures to ensure: • Temporary offices have adequate wastewater handling and disposal facilities. Their disposal must be made in close collaboration with the local government authorities (i.e., municipalities) and licensed companies. • Provide sufficient toilets at active work areas for staff and workers and these should be serviced regularly by a competent and suitably qualified person. • Undertake due diligence of the WWTP in Silistra for alignment with GIIP • Excavation must not occur in extreme weather conditions (rain, strong wind).	EPC Contractor	Construction	Wastewater discharges

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		• Prohibit discharge of the resulting water during the construction period, on the ground, on the site or in the vicinity. • Removal of oil products accidentally leaked from machines in operation will be carried out using absorbent materials that will then be stored in specially arranged spaces and handed over to the authorized units for collection and/or disposal. • Handling of materials or other substances used in technologies will be carried out in such a way as to avoid their dissolution and entrainment by precipitation waters. • Equipment and vehicles will be periodically checked to avoid the possibility of accidental leaks due to defects. • Storage of materials within the construction site must be secure with adequate and efficient handling practices to avoid losses and accidental pollution • Provide culverts along new access roads to facilitate drainage along with ditches. Where practical, exposed surfaces and friable materials should be covered. • Washing of vehicles and equipment will be done exclusively in areas specially designed for such operations. • For the avoidance of spills ensure refuelling on site is developed to avoid accidental spillage, like providing drip trays and bunding for storing fuel and waste chemicals/ substances. In case of accidental leakage of petroleum products, absorbent substances will be applied immediately. • Areas where spillage of contaminants occurs should be excavated (to the depth of contamination) and suitably rehabilitated. If any other minor spillage occurs, it should be cleaned immediately, and the contaminated area should be rehabilitated. • Responsible storage and disposal of liquid effluents such as sewage from temporary accommodation using certified disposal companies. • Intermediate storage of bulk construction materials, which can be washed away by rainwater and can pollute the soil, subsoil and underground water, must be stored in closed or covered spaces; materials will be transported in conditions that limit the pollution of the atmosphere by sprinkling the material, covering it, using trucks with buckets/containers suitable for the type of material transported, etc. • The work schedule must prevent overloading of the site with materials, as well as storage of material stocks on the site for excessive timescales. • Technology for executing the project's objectives will be respected, taking measures to prevent and combat accidental pollution. • Comply with the environmental and execution conditions of the works imposed in the project for the execution of the works. • Good general housekeeping. • Conduct continuous training and education awareness of all project employees regarding waste management practices to avoid reducing the risks of waste generation and potential impact during the construction phase. • Sanitary wastewater tanks to be properly maintained and inspected to ensure tanks do not overflow. • Site inspections will be carried out regularly by the EPC Contractor to ensure that all wastewater generated is properly managed, and no leakages or spill occur. In the event of a spill or overflow, immediate action will be taken in accordance with spill containment procedures and clean up procedures. • Engage a licensed waste/wastewater contractor for the periodic emptying of septic tanks. • Any wastewater disposed of offsite must be assigned to appropriately licenced waste contractors and be transported to appropriate wastewater managements facilities.			
Minimise road hazards, congestion, and damage to road infrastructure (surfaced roads) and residents along the route (see also CHS below)	PV Site/ROW clearance Equipment delivery	• Contractors should use a pre-defined route to the material and equipment laydown area (EPC to confirm delivery route) • Design laydown area and delivery approach to minimize vehicle stopping outside the site • Obtain any necessary approvals. • Include clause in the EPC contract that that any damage to road (wear and tear over the construction period) must be repaired promptly and that roads are left in original or better condition at the end of construction activities	EPC Contractor (subcontractors)	Construction	Approved Traffic and Transportation Management Plan Training logs/ attendance sheets

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		• Survey the condition of roads to be used for concrete supply, equipment, and component deliveries prior to construction and submit reports to local road authorities. (pre-construction). • During preconstruction surveys, perform a photographic assessment of road condition and private properties adjacent to the local road and R218. • Undertake periodic route and access surveys throughout construction on road conditions and ensure that any damage to existing roads is repaired promptly and that roads are left in original or better condition at the end of construction activities • Undertake road improvements where needed to facilitate road traffic generated by the Project. • Consider excluding access option three which requires access through the village of Polkovnik Lambrinovo. • Work with local authorities in scheduling truck deliveries, especially oversized truck deliveries, to reduce impacts on road function and safety. Specifically, where safe and feasible, schedule deliveries to minimise travel impacts for other road users based upon local conditions and the results of stakeholder engagement. • Consider scheduling deliveries during non-peak hours and at intervals to avoid queuing of delivery vehicles along public roads near the access points to internal Project roads. • Demarcate delivery roads and access tracks across the site and ensure all workers stick to demarcated areas. • CLO to engage the local community to inform them of the start of construction works and timings for large vehicle deliveries • Install appropriate signage to inform local communities and road users of site access points. • No night-time driving along unsurfaced roads. • No night-time deliveries • Maximum of 40km/h on the section of road between R218 and Polkovnik Lambrinovo • Signage on R218 and local roads after Silistra to advise road users of the construction site entrance. • No stopping of Project-related vehicles or abnormal loads is allowed between Silistra and the Project site. • Plan and implement awareness campaigns on risks related to the traffic increase, especially in the schools present in the area.			Signage in place
Develop Transport and Traffic management Plan (TMP)	Project construction and operations	Develop TMP to include the following GIIP and align with IFC EHS General Guidelines. Include in TMP the following GIIP as a minimum: • Measures to transport Project components as well as transportation of workers. • All drivers to undergo a driver induction. • Prepare a disclosure plan for community members, to inform them of the start of construction works and timing and Project impacts along transportation routes. • Provisions for local communities to be informed, in a timely manner, about road closures, works on roads or use of heavy good vehicles. • Plan and implement awareness campaigns on risks related to the traffic increase, especially in the schools present in the area. • Details of transportation patrol/ escort vehicles and/or possible police escort to guarantee safety of other road users and to inform the respective authority for the overloaded trucks. • Address transportation safety risks of Project traffic, including (but not limited to) truck routes, hours of transport, community notification, signage, education, and other measures to minimise safety hazards (construction, decommissioning)			

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		• Obtain permits and implement all necessary road improvements or alterations prior to deliveries. If necessary, construct bypasses to avoid hazards to properties or other road users at constrained road segments or intersections. (pre-construction, construction, decommissioning) • Plan truck routes for non-oversized loads using roads with adequate geometrics and load-bearing capacity for safe passage (pre-construction, construction, operations, decommissioning) • Consider community schedules that result in higher levels of local traffic, school schedules, or community events. Schedule truck traffic outside of these times in addition to avoiding periods of peak traffic volumes (construction, operations, decommissioning) • Undertake route and access surveys on road condition and ensure that damage to existing roads is repaired promptly and that roads are left in original or better condition at the end of construction activities. • Restore signs, streetlights and other street furniture removed for or damaged by the movement of Project-related trucks (construction, decommissioning) • Work with local road authorities to identify damage to and restore county, communal, and agricultural roads used for Project-related traffic. • Coordinate with national road authorities (the Bulgarian Road Infrastructure Agency (RIA)) to coordinate and contribute to repair and maintenance of national roads damaged by construction (construction, decommissioning). • If temporary access roads are necessary, the land required for these works will be returned to its original condition. • Possible use of flag men or other means of traffic control at key points on roads, especially during school hours in hotspot areas • All vehicle drivers must be in possession of valid driver's license for the class of vehicle they drive • Frequent testing of drivers to enforce no drink driving requirement, also check for use of seatbelts and identify speed limits that are monitored during the construction phase. • All drivers must use only designated routes • All traffic signs must be respected • No vehicles should be driven if loaded in excess of its manufacturer-specified weight bearing capacity • Use of cell phones while driving is prohibited • All accidents and traffic violations must be reported by drivers to the Project management team • Only company employees are to be transported in the company vehicle			
Minimise road hazards, congestion and damage to road infrastructure (unsurfaced roads/construction areas)	Equipment delivery	• Ensure drivers are trained to drive heavy goods vehicles (HGVs) on unsurfaced roads (where necessary). • Check that all drivers have the necessary license for their vehicles. • Ensure all vehicles have up-to-date maintenance records. • Minimise transport of workers along the unsurfaced road sections and use pool vehicles where possible. • Notify the Project Company at least 10 days in advance of start of PV Panel deliveries and abnormal loads so that they may inform the local communities about the delivery of any wide/heavy loads and how it could impact their road use.	EPC Contractor (subcontractors)	Construction	Traffic and Transport (Logistics) CMP Training logs/ attendance sheets Maintenance records Meeting minutes/ attendance sheets/ (SE log – maintained by Project Company)

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI

Minimise traffic-related accidents (surfaced and unsurfaced roads)	Equipment delivery	• Demarcate delivery roads and access tracks across the Site and ensure all workers stick to the demarcated area.
		• Adhere to state road speed limits on national .
		• Minimise pedestrian interaction with construction vehicles.
		• All drivers are to undergo a driver's induction training and sign the driver's code of conduct.
		• Employ safe traffic control measures, including road signs and flag persons, to warn of dangerous conditions along the unsurfaced road to the work fronts.
		• Report all traffic accidents and statistics in weekly EHS reporting (all contractors)
		• All drivers carrying personnel or material along unsurfaced roads must undertake off-road driver training.
		• Provide awareness training to receptors (local residents).
		• No night-time driving along unsurfaced roads.
		• Establish and implement standards addressing the following:
		  ○ Training and accreditation for project drivers, including contractors.
		  ○ Driver fitness standards, including mandatory rest periods and prohibition of drug/alcohol use.
		  ○ In-vehicle monitoring systems to monitor vehicle speed and location (Project vehicles and contractors).
		  ○ Project and contractor standards for vehicle safety and maintenance.
		  ○ Security response for vehicle incidents.
		  ○ Load stability standards.
			EPC Contractor (subcontractors)	Construction	Training logs/ attendance sheets

Minimise impact to soils (contamination)	Site/ROW clearance	Develop a Topsoil Management and Site Reinstatement CMP that includes the following GIIP requirements and aligns with IFC EHS Guidelines: General: • Avoid total removal of vegetation of the whole Site where possible, e.g., around the edges of the Site and the substation site (as set out in the Biodiversity Management Plan) • Refuelling of delivery vehicles is to be undertaken in Silistra. • Refuelling plant and equipment (on-site) will be carried out in a designated area and on hard standing ground to prevent seepage of any spillages to soil/groundwater. • Drip trays must be used when refuelling and servicing vehicles or equipment not on the designated refuelling hardstanding surface. • Oil interceptors and silt traps shall be implemented to manage and retain sediments on site for surface water runoff. • Spill containment and clean-up kits will be available on-site, and clean-up from any spill shall be appropriately contained and disposed of at a bound landfill site. • Preparation of guidelines and procedures for immediate clean-up actions following any oil, fuel or chemical spillages. • Develop a site-specific Emergency Response Plan for soil clean-up and decontamination. • Implement a training program to familiarize staff with emergency procedures and practices related to contamination events. • Develop and implement a waste management plan (as part of the cESMS) to ensure that waste is disposed of correctly such that soil contamination is minimized. • Fuel, oil, and used oil storage areas shall be contained in bunds of 110 per cent capacity of the stored material with impermeable bases and bunds and more than 70m from the S-L Protected Area. • Storage containers will be regularly checked and maintained • Construction vehicles/pieces of machinery and equipment shall be serviced regularly at off-site locations	EPC Contractor (subcontractors)	Construction	Environment, Pollution Prevention and Control CMP Site inspection records Construction reports

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		• Ensure that all construction plant and equipment are maintained in a good state of repair with minimal leaks • Rehabilitation and re-vegetation of cleared areas adjacent to the project development area. In addition, after completion of construction, all the temporary roads and embankments will be reinstated, lands will be re-cultivated, and the micro relief will be reproduced. • Adequate sanitary facilities should be provided for the construction workforce. One mini toilet is recommended for every seven workers and not less than 1:15 workers. • Licensed companies shall be contracted to manage and dispose of wastes, wastewater and sludge from the septic tank.			
Minimise impact to soils (degradation)	Site/ROW clearance	• Existing excavated material from clearance of the site (undertaken prior to commencement of the project) will be handled and disposed of (if necessary) appropriately taking into account Bulgarian waste management and other relevant requirements and provisions of this ESMP. • Demarcate specific tracks to site/ROW and track vehicles to ensure only demarcated routes are used. • Confine traffic movement to designated routes/tarmac areas within the PV Site. • Control access to areas within the Site that are not required for construction. • Topsoil will be stored and used to rehabilitate affected construction areas. The topsoil stockpiles' height should not exceed 2m.	EPC Contractor (subcontractors)	Construction phase	Site inspection records Construction reports
Implement sustainable site clearance and rehabilitation practices to avoid impact on natural habitats.	Site/ROW clearance	• Existing excavated material from clearance of the site (undertaken prior to commencement of the project) will be handled and disposed of (if necessary) appropriately taking into account Bulgarian waste management and other relevant requirements and provisions of this ESMP. • Demarcate the PV plant construction zone and servitude for the TL corridor on a map and on the ground clearly using high visibility tape or other high visibility method, to avoid impacting on sensitive areas outside of the permitted construction area • Implement relevant construction standards (e.g. 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites' – DEFRA, 20096F6F). • Topsoil Management and Site Reinstatement MP will address topsoil removal following sustainable land-use practices: • When stripping, stockpiling, or placing soil, do so in the driest condition possible and use tracked equipment to reduce compaction. • Topsoil to be stripped to a thickness defined by depth below the surface and a distinct colour change. • Clearly define topsoil and sub-soil stockpiles of different soil materials for reuse of topsoil. • Keep soil storage periods as short as possible. • Monitor soil restoration • Immediately restore topsoil and vegetative cover using seeded restoration techniques for all disturbed areas (where work is not planned) in the PV Site • Reuse materials on-site wherever possible • No imported soils or aggregates • Regular checks and surveys for AIS every three months • Organic topsoil (superficial layers) will be used on-site and near the Site for revegetation activities.	EPC Contractor (subcontractors)	Plan – pre-NTP Construction phase	Site inspection records Construction reports
Minimise secondary impacts on soils from vegetation removal and works.	Site ROW rehabilitation	• Rehabilitate the compacted area to support the return of the impacted area to the original state as quickly as possible following the completion of the works. This may require aeration of the topsoil, enrichment of the topsoil or reintroduction of selected species and shrubs. Do not rely on natural rehabilitation. • Reflect natural gradient and relief when reinstating soils.	EPC Contractor (subcontractors)	Construction phase	Rehabilitation plan

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
Ensure appropriate handling, storage, and disposal of solid and hazardous waste to minimize impacts to groundwater, land, and workers.	Demolition waste clearance	• Existing excavated material from clearance of the site (undertaken prior to commencement of the project) will be handled and disposed of (if necessary) appropriately taking into account Bulgarian waste management and other relevant requirements and provisions of this ESMP.	Owner	Pre-NTP/construction	Evidence of clearance
Ensure appropriate handling, storage, and disposal of solid and hazardous waste to minimize impacts to groundwater, land, and workers.	Site/ROW clearance	Develop Waste Management Plan (WMP) to include the following GIIP requirements and to meet WBG EHS General Guidelines: • Identity and characterise the source of all waste streams (hazardous and non-hazardous) and the proposed final disposal option (Site waste management) • Define and demarcate dedicated temporary waste collection site at the worksite • EPC contractor is required to conduct a duty of care audit for proposed general waste, construction waste, hazardous waste and recycling facilities in the municipality and region to confirm compliance with GIIP for acceptance by the Project Company. • Perform due diligence and identify temporary waste storage and collection points (hazardous and non-hazardous) at the Site for coordinated onward transportation and disposal at a licenced facility. • EPC contractor to ensure all subcontractors use approved waste disposal routes only following the outcomes of the waste due diligence audits. • Offices required to have adequate waste handling and disposal facilities. • Arrangements for collecting non-hazardous and hazardous wastes must include on-site waste bin equipment provisions. • Waste bins to be segregated according to the waste stream, e.g., organic, hazardous, paper/cardboard, plastic, and metallic waste. Their disposal and recycling must be made in close collaboration with the local government authorities (i.e., municipalities) and licensed waste recycling companies. • Provision of chemical/ mini toilets for workers at the base camp must be in the ratio of 1:7 and maximum of 1:15 (toilet to workers), respectively, to maintain hygienic and clean surroundings. • Segregation, reuse and, where feasible, recycling of wastes by registered operator; construction contractor must follow the 3R (reduce, reuse, recycle) policy to manage the solid wastes • Site all temporary onsite waste storage areas at least 250m from the L-S Protected area • Identify waste reuse and recycling disposal routes to process waste streams (following Bulgarian requirements) and set up agreements • Identify construction waste landfill • Obtain copies of licenses and authority of final disposal locations • Identify and contract authorized transportation company to take waste to the disposal facility (in particular hazardous waste) • Waste storage/collection areas shall be fenced, with an impermeable base and equipped with relevant signage (e.g., urban waste collection area) • Segregate waste material on-site for disposal via the identified channels as per SWMP) • All skips/waste storage to be suitably covered (to avoid dispersion of light materials by wind or filling of skip with rain) and waterproofing to avoid soil contamination from leachate. • Hazardous waste must be designed according to GIIP (bunding, separating incompatible hazardous substations, etc.) as defined in WBG EHS General Guidelines and in line with national requirements. • Liquid wastes/oil/chemicals will be stored in tanks or drums in bunded areas that can hold the larger of 110 percent of the largest tank or 25% percent of the combined tank volumes in areas with above-ground tanks with a total storage volume equal or greater than 1,000 litres and will be made of	EPC Contractor (subcontractors)	Pre-construction (for plan) Requirements are ongoing during the construction phase.	Environment, Pollution Prevention and Control CMP Site inspection records Construction reports Waste Management CMP

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		impervious, chemically resistant material according to national safety requirements and WBG EHS General Guidelines, whichever is stricter. • Avoidance of refuelling on site to prevent oil spills. If this is not possible, procedures will be developed to avoid accidental spillage, like providing drip trays and bunding for storing fuel and waste chemicals/ substances • Implement good housekeeping and operating practices, including inventory control, to reduce waste from out-of-date materials, off-specification, contamination, damage, or excess to plant needs. • Define and establish a documentation management system for tracking waste (duty of care) • Maintain a hazardous waste inventory. • Conduct continuous training and education awareness of all employees of the project regarding waste management practices in order to avoid, reduce the risks of waste generation and potential impact during the construction phase.			
Prevent leaks, spills, and environmental incidents.	Site establishment & Construction	EPC contractor to develop a spills response protocol (as part of the Environment, Pollution Prevention and Control CMP), including requirements to: • Maintain an inventory of hazardous materials and specific procedures/ controls • Maintain available copies on Site of material safety data sheets (MSDS) for all hazardous substances used during the Project: • Establish hazardous materials storage areas that are located away from existing sensitive receptors and are secure from theft or vandalism, well-ventilated, and have suitable emergency response equipment (fire extinguisher, eye wash etc.) and PPE. • Ensure spill kits are located and first response equipment at all work fronts. • Ensure no hazardous materials are stored in large quantities at the work fronts or the central materials store and laydown area.	EPC Contractor (subcontractor)	Pre-construction (for plan) Requirements are ongoing during the construction phase.	Spills Response Protocol (Environment, Pollution Prevention and Control MP) Site inspection records Construction reports
Minimise impact on habitats – General	Construction stage	Develop Environment, Pollution Prevention and Control MP aligned with the requirements of Project Company Biodiversity management Plan (002) plus the following GIIP: • Before the start of construction and during all stages of the construction, a team of environmental biodiversity experts must be present to the territories and, if necessary, remove amphibians or reptiles from the areas intended for construction, in accordance with the construction scheme. Thus, the probability of mortality of individuals will be significantly reduced. • Use existing access roads or upgrade existing roads wherever possible before considering new access road construction • Restrict vehicles to the use of only authorized access roads • Minimise use of trenches or other steep-walled excavations • Backfill open excavations as soon as possible after construction activity. • Ensure signage, inclusion in worker's code of conduct and training to prevent construction workers from poaching and to promote protection of wildlife. • Fence localised worksites before the start of construction works to avoid encroachment by mammals. • For OHTL works, do not leave trenches open overnight unless they are fenced. • Prohibit poaching (focusing on CITES species) and interactions with fauna and flora in the worker code of conduct. • Worker/contractor training/awareness, supervision regarding impacts to animals and species protection. • During construction, minimise impact to neighbouring territories - such as trampling, passage of heavy equipment, storage of materials and this limit disturbance, reduce affected areas to limit potential deaths of individuals, i.e. the impact on species will be limited to the areas of construction and will not cause the same effects over larger areas.	EPC Contractor (subcontractors)	Pre-construction (for plan) Requirements are ongoing during the construction phase.	Pollution Prevention and Control CMP Site inspection records Construction reports

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		• Where possible, the storage of materials should be carried out only in areas around the airport runway - this will lead to limiting the effects of temporary soil damage and reducing the area for reproduction, development and foraging in most animal groups and will reduce the additional trampling of territory and changes in mechanical composition so important to invertebrates • All activities should be carried out only during the daylight hours to reduce the disturbance of nocturnal animals. • In the event that a site perimeter fence is installed (preferred) - provide access areas/passages through which rabbits, foxes, jackals, land turtles and other small species can pass. As the size of the opening must be not less than 40/40 cm for every 100 linear meters of length of the fence along its entire perimeter. • Reduce the speed limit of equipment and personnel vehicles to 15km/h within the Lambrinovo airport's runway and road areas to reduce the risk of amphibians, small mammals, and invertebrates being run over. • Apply a rotation scheme on small areas moving from east to west to remove vegetation around the PV facilities - panels, inverters and others in accordance with the instructions of an ecologist/biologist, as a result of monitoring (before starting removal activities of vegetation). This will enable species from the groups of amphibians, reptiles, mammals and partially from invertebrates to move to neighbouring territories and limit disturbance and possible mortality. • Prohibit the use of herbicides to limit the spread of grass, tree and shrub vegetation in PP areas - this will limit possible negative effects on insects, amphibians and entrants, such as mortality or possible diseases. • Compile a suitable Invasive Alien Plant (IAP) species control plan and programme to manage IAP's within the control of the development • Implement IAP species surveillance and control plan within areas in the projects control, focusing particularly on areas of natural habitat • Monitor IAPs to inform further management intervention. • Prohibit the use of pest control measures (rodenticides) to limit the population of rodents - it will cause unwanted mortality among rodents, but also re-poisoning of predatory mammals or birds. • In the areas where no PV installations are constructed, but are part of the plant's service areas, grass and shrub vegetation should not be removed or should be revegetated. This will enable these areas to serve as temporary and permanent refuges for amphibians, reptiles, mammals and invertebrates • Minimize further soil/vegetation disturbance during construction. • Use only demarcated area for laydown and access (construction and operation) • Prepare decommissioning management plan (including management of biodiversity impacts) prior to decommissioning			

Raise worker awareness of the biodiversity risks	Construction works (PV/OHTL)	• Add the following to the Project specific Worker Code of Conduct - "Workers are prohibited from:
		  ○ Removing flora from the work area
		  ○ Hunting any species
		  ○ Interaction with large mammals'
		Penalties to be imposed for infractions
		• During the site induction, make workers aware of the following sensitivities:
		  ○ What to do when encountering asnakes etc.
		• Provide works with a visual reference sheet
			EPC Contractor (subcontractors)	Construction phase	Site inspection records
					
					Construction reports

Manage potential unexpected discovery of	Substation, PV and OHTL foundation work	• Establish a chance-find procedure (including national and lender requirements and following GIIP) for the construction phase or any phase that requires excavation work in accordance with Project Company Chance Finds Plan (011)	EPC Contractor (subcontractors)	Construction phase	Contract with IOA Chance Finds Procedure

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
archaeological remains/ artefacts		• Train workers on chance finds procedure during induction and all excavation works (via toolbox talks). • Maintain a chance finds log. • Notify the National Institute of Archaeology under the Academy of Sciences of Bulgaria of any finds. • Carry out ongoing discussions with local community members about the cultural significance of the Site as part of broader public consultation exercises.			Toolbox talk logs Chance finds the register (if necessary)
Safeguard the wellbeing and improve the living standards of those whose livelihoods are involuntarily displaced.	Livelihood restoration	• Implement ongoing livelihood restoration activities (if not already completed before construction) as per the LRF (013). ○ Prepare LRF close out report	Project Company	Construction phase	Close out report
Protect worker health and safety.	All construction and operations activities	• Require EPC Contractor to be certified to ISO 45001 (or equivalent) • All contractors and subcontractors to implement Project OHS requirements • Incorporate measures to reduce the risk of hazards impacting the project as per national codes and norms and international standard specifications • Develop an Emergency Preparedness and Response Plan (EPR) which includes responsibilities and actions in case of emergency situations and considers community as well as worker and asset protection/impact limitation (se below). Establish Occupational Health and Safety (OHS) Management Plan in accordance with Employer OHS (009) including *inter alia:* • Management measures for occupational dust, occupational noise, falls from height, electrocution risks etc. • Require EPC contractor to implement communication systems to enable communications from any part of the site. • Specify safety signage throughout the Project site, following GIIP specifications and codes of practice. • Preventative maintenance to ensure the robust connection of the lightning protection (earthing) system • Site risk assessment for all tasks to be undertaken on the Site. • Recommended techniques to prevent the electrocution hazards include use of signs, barriers, to prevent shock • Provision of automatic fire detection systems linked to automatic shutdown systems to allow fires to be dealt with in the shortest possible time by disconnection from the power supply systems. This includes substations • After any damage has been assessed and documented in case of storm damage / wind damage etc, the utility companies will be notified. Lastly, if safe to do so, damaged areas will be protected from further damage • Communicate hazards and risks to all workers during setting-to-work briefings. • Mandatory PPE, including steel-toe capped boots, overalls, hard hat, hi-vis vest, safety glasses, hard hat AND ear protection, gloves, and dust masks for specific tasks (e.g., welding). • Worker induction programme. • Worker Code of Conduct. • Training to all workers ongoing throughout construction and including toolbox talks and regular refresher training where needed. • Drills (including OHS, spills, and emergency drills) should be undertaken regularly • OHS inspection and audits and ensure there is a corrective action process. • Establish an accident and incident reporting procedure for accidents, diseases, incidents, near misses, positive interventions etc.	EPC Contractor (subcontractors)	Construction phase	Occupational Health and Safety Management Plan Risk assessment Worker Code of Conduct Worker Induction Program Training logs/ attendance sheets Audit reports Incident reports

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		• Provide incentives for reporting near misses and positive interventions and observations. • EPC Contractor and subcontractors to hire HSE Managers and Officers (1:50 for construction workforce) Develop a project specific Emergency Preparedness and Response Plan (EPRP) • Ensure medical preparedness includes permanent on-site paramedic, first aid facilities and first aiders (ratio of 1:50 first aiders/workers) • Provide worker shelter, toilets and provisions (including drinking water) at work fronts across the site (not just at the main site camp). • EPC contractor to employ at least one HSE Manager and an EPC Contractor HSE Officer for every 50 workers. • Subcontractors with more than 20 workers shall deploy a dedicated HSE Officer and an additional HSE Officer for each additional 50 workers deployed onsite. • Implement mitigation measures in relation to lead in the soil (including an assessment of required personal protective equipment (PPE) for workers and training in the risk of lead contamination).			
Protect community health and safety.	All works	• Incorporate community safety requirements into the project design. • Develop an Emergency Preparedness and Response Plan (EPR) which includes responsibilities and actions in case of emergency situations and considers community as well as worker and asset protection/impact limitation (see below). • Where necessary include fencing, safety signage (in locally used languages) and other relevant features to deter community members from entering the Project site. • Installation of anti-climbing devices to avoid accidental or intentional attempts to access the site • Painting with fluorescent colours of towers near the roads to make them visible. • Prepare a disclosure plan for community members, to inform as to the start of construction works and timing and Project impacts along the transportation route. • Undertake a stakeholder engagement campaign to inform community members of the possible risks and impacts of the construction of the Project (refer to SEP), including traffic, grievance mechanism, worker conduct, GBVH risks • Disclose community grievance mechanism to local communities and houses surrounding worker accommodation. • Undertake cultural awareness training for migrant workers, should it be deemed necessary. • Undertake OHS and emergency drills throughout the construction and operations phases. • House workers from outside the project area or municipality in accommodation away from the immediate directly affected communities as much as possible, thereby reducing potential social tension. • Prepare a plan/strategy to guard workers and community members against contracting communicable diseases. • Develop a Worker Code of Conduct to be read and signed by all workers on the contract during the induction process. • Include in the worker code of conduct, requirements for addressing potential gender-based violence and harassment (GBVH) risks on the Project and setting out a zero-tolerance policy for the following: • Use of drugs or alcohol • Incidents of GBVH • Security personnel to not be armed unless prior approval from Project Company • Ensure the security and plan includes requirements for vetting security guards, training on using force, security guard code of conduct etc. • Employ local security guards and female guards where possible. • Establish signs across the Project Site and along roads to warn local community members and other external stakeholders of any risks and hazards, e.g., from site vehicles and electrical equipment.	EPC Contractor (subcontractors)	Construction phase	Worker Code of Conduct Vetting of security guards Training logs/ attendance sheets Signs in place Meeting minutes/ attendance sheets Number of grievances received

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		• Provide cultural awareness training for all workers. • Nominate a community liaison officer (CLO) counterpart (social officer) for the construction and operations phases. • Determine whether training for community members and workers on communicative diseases is necessary and implement if needed (to be determined by the CLO).			
Labour wellbeing	All works	• Require contractor (via EPC Contract) to conform to Company Human Resources (HR) Policy, Code of Ethics, Policy Against Bribery and Corruption, Recruiting Policy, Supply Chain (Procurement) Policy, and Communication Policy. • EPC Contractor and Tier 2/3 sub-contractors to demonstrate functioning HR policies to meet with Lender requirements, ILO core conventions and Bulgarian law in contractor contracts. • Define manpower requirements for the construction and operation phases for the EPC contractor and subcontractors, and the O&M contractor including the number of E&S personnel and their qualifications. • Perform a supply chain due diligence or obtain third-party supply chain due diligence reports to verity potential suppliers' credentials regarding the occurrence of forced labour, child labour or occupational health and safety failures. The supply chain will be mapped (to the polysilicon level) and verified by an independent consultant for point of origin. • Suppliers shall have a system to identify and manage risks associated with child labor, forced labor, occupational health and safety and pollution prevention for their activities and their core supply chain. • Provide workers with a safe and healthy work environment Develop and implement a workforce MP during the pre-construction and construction phase which will include measures required by IFC PS 2 for the economy, employment and livelihood component: • Collaborate with the State Employment Offices • Collaborate with local institutions (municipality and administrative units) • Put in place transparent and fair recruitment procedures • Strictly follow the Bulgarian Code of Work requirements • Adopt and maintain human resources policies and management systems or procedures with the requirements of IFC PS 2 and national law. These policies and procedures will be understandable and accessible to workers, and in the main language(s) spoken by the workforce. HR policies and management will ensure: o Non-discrimination and equal opportunities to all workers o Compliance with national laws and international standards regarding employment of minors o Avoidance of any form of forced labour and child labour o Provide clear and transparent information on wages, benefits and working conditions o Provide workers with a safe and healthy work environment o Use an international workforce for a term-limited period for compliance and training purposes, where national personnel cannot be sourced. • Prepare a Worker Accommodation Management Plan	EPC Contractor (subcontractors)	Construction phase	Workforce CMP Worker contracts Training logs/ attendance sheets Grievance mechanism Number of grievances received Labour statistics

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		• Provide equal training for men and women • In field training during the development of implementation phase, also through contractor/s and sub-contractors • Establish training and re-training programme that specifically target women, to increase their opportunities • Define number of women to be interviewed for a new position • Clearly indicate the positions/opportunities is for both men and women • Provide a women friendly working environment • Ensure all workers on the Project have a written project contract that clearly specifies their terms of employment, consistent with the local labour law and the IFC PS2. The terms of employment should be largely similar for all categories of the Project workers. • EPC contractor and subcontractors to provide contract templates for review to ensure their overall compliance with the applicable labour standards. • Ensure that both migrant and local workers are engaged on substantially equivalent terms and conditions. • Provide an HR onboarding for all workers and explain the contract terms as per EBRD PR2. • Establish a Code of Conduct – Workers, including Workforce Grievance Mechanism (WGM) and ensure confidentially and anonymity where required. The WGM shall be open to employee and non-employee workers. Ensure that all workers directly and indirectly employed are informed on how to submit grievances. • Ensure appropriate welfare provisions (water, shelter, sanitary facilities, food) at the Site. • Ensure all workers receive the appropriate training as per the training need analysis and matrix developed under the ESMS (note specific requirements for working within a substation or on live equipment). • Undertake daily toolbox talks at all work fronts. • See also requirements under Emergency Preparedness and Response. • Provide all workers with notification of the duration of their contract at the start of work. • Develop labour reporting statistics for all workers, including identifying labour statistics per worker category (local, regional, international) and the split between male and female workers.			
Emergency preparedness - general	All works	Develop EPRP in accordance with Project Company EPRP (010) and with the following minimum requirements: • Identification of the emergency scenarios. • Specific emergency response for each situation relevant to the Project. • Emergency contacts and communication systems/protocols (including communication with affected communities when necessary). • Outline of medical facilities and services required on-site in a Medical Services Procedure and a Casualty Evacuation Procedure. • Outcomes of assessment of local emergency services capabilities and identify gaps that may need to be filled with site-based emergency response capabilities in the form of a “capacity assessment” appended to the EPRP (for approval). • Procedures for interaction with government authorities (emergency, health, environmental authorities), including names and contact details. • Site plan indicating requirements for permanently stationed emergency equipment and facilities (e.g., first aid stations, firefighting equipment, spill response equipment and personal protective equipment (PPE) for the emergency response teams). • Minimum requirements for trained medical professionals on-site, including first aid stations • Develop protocols for the use of emergency equipment and facilities.	EPC Contractor (subcontractors)	Construction phase	EPRP Site medical services in place Drill reports

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		• Ensure clear identification of evacuation routes and Assembly Points (AP) for each work location highlighted on a site plan. • Identification of training requirements for all employees and third-party providers. • Emergency drills and their frequency are based on assigned emergency levels or tiers and an implementation schedule. • Emergency Drills to include government/municipality emergency, health, environmental authorities wherever possible • Establish a site clinic to provide emergency first aid to employees capable of providing first aid response to electrocution, falls from height, etc. • Develop medical evacuation procedures to the nearest A&E facility.			
Emergency preparedness – climate risks/natural hazards	All works	• Undertake continuous monitoring of weather events to enable an early warning of any high winds, storms, dust storms, or extreme precipitation to enable workers to get to shelter. • Establish worker emergency shelter at the Site and protocols for extreme heat stroke cases. • During periods of high wind (15km/h+), dust-generating activities will not be permitted. • Provide all workers with dust masks in the event of a localized dust event. • Ensure sufficient supply of potable water at the work fronts (>3.5 L per worker per day). • Ensure sufficient shelter/shade during summer months. • Provide extra rest periods for workers when temperatures exceed 35ºC. • Change the shift hours in line with the cooler hours. • Ensure workers are not penalised for taking extra rest breaks during periods of extreme heat. • Erect temporary shade at all work fronts for all workers.	EPC Contractor (subcontractors)	Construction phase	EPRP Worker emergency shelters

Emergency preparedness – Spill response		• Prepare Spill Response Plan (may be part of the EPRP) and include appropriate training and requirements for spill prevention and cleanup equipment including:
		  ○ Use barriers (e.g., drip trays) to minimise impacts from spills or other potential leaks.
		  ○ All chemicals, fuels, and oils are stored at the construction camps and laydown area to be in designated areas in a secure and bunded facility.
		  ○ No herbicide uses.
		  ○ Do not refuel except at a dedicated refuelling area.
		  ○ All concrete washout to take place at designated concrete washout area only.
		  ○ All cement trucks must return to the batching facility or a dedicated wash-out facility to perform cement washout.
		• Works with hazardous liquids must be performed over an area of hardstanding to avoid seepage to groundwater in the event of a spill.
			EPC Contractor (subcontractors)	Construction phase	EPRP – Spill response procedure

Security	Site/ROW/Accommodation	• Perform a Project Security Risk Assessment (SRA)
		Develop Security Management Plan in accordance with Project Company Security Management Plan (008) including the following:
		• Security arrangements roles and responsibilities
		• Site access (project personnel identification, visitors identification vehicles identification etc.)
		• Project security approach and systems, e.g., security barriers, fences, gates, locks, fortifying facilities, and means of access control
		• Accommodation security
		• Security-related communication arrangements
		• Interface with host government agencies and public security forces
		• Provisions to ensure compliance with regulations and good industry practice regarding:
		  ○ Security personnel selection, vetting and employment
		  ○ Security personnel rules of conduct,
		  ○ Security personnel equipment, uniform
			EPC Contractor/ Security contractor	Construction phase	Project SRA
					EPC Security Management Plan
					Security Code of Conduct
					Training logs/ attendance sheets

Objective	Project Activity	Action	Responsibility	Timescale	Monitoring / KPI
		○ Requirements for training of security guards on human rights and use of force, weapons handling (if needed), human rights and receipt of grievance ○ Monitoring of compliance and investigation process of non-compliance acts • Security training program including: ○ Security Code of Conduct (to be signed by all security personnel) ○ Voluntary Principles on Security and Human Rights • Grievance mechanism			
Safeguarding community members and workers against communicable diseases (including COVID-19)	All works	EPRP include a procedure for managing communicable diseases, including but not limited to the following requirements: • Measures to minimize the risk of contamination of site personnel from outside the project site (and construction camp), particularly local workers not residing in the accommodation camp. • Measure to minimize the risk of transmission to the local community from site personnel. • Emergency procedure in case of positive cases or outbreak (for affected personnel and potentially affected personnel). • Procedures for managing the risk of transmission to the local community (especially the management of mixing workers from the community with those housed in workers' accommodation). • Provide PPE to reduce the risk of spreading COVID-19, such as masks and hand sanitizer (as needed).	EPC Contractor/ Security contractor	Construction phase	EPRP

MITIGATION AND MANAGEMENT COMMITMENTS – OPERATION PHASE

Objective	Activity	Action	Responsibility	Timescales	Evidence
Compliance with national requirements	O&M works	• Obtain operational environmental approval prior to the start of operation	Project Company	Pre-operation	Operations Permit
Implement ESMS in line with ISO14001 (environment) and ISO45001 (health and safety).	O&M works	• Ensure ESMS includes relevant requirements for E&S and H&S-related training, communication, monitoring, reporting, accident incident reporting, auditing, management review, and continuous improvement.	Project Company	Annually	Annual ESMS audit
Operational management planning	O&M works	• Implement operational ESMS to implement operational ESHS management requirements of the Project. • Develop Project O-ESMP. • Ensure grievance mechanism is disclosed in project areas • Maintain regular stakeholder engagement, at least annually. • All maintenance work to have a specific risk assessment addressing waste, climate risks H&S, hazardous material management, emergency preparedness and response, and traffic risks) • Implement waste management practices in line with O-ESMP and ESMS • Ensure correct PPE at all times	Project Company O&M contractor	Annually	Project O-ESMP Annual reporting GM Log SE Log Risk Assessments (maintenance works) Waste documentation
Occupational Health and Safety	O&M works	Establish Occupational Health and Safety (OHS) Management Plan requiring: • Management measures for dust, occupational noise, falls from height, electrocution risks etc. • Define workplace protocols for maintenance activities. • Employ EHS officer to oversee Project Company obligations (may be based off site). • Update the emergency preparedness policy and emergency preparedness and response plan for the operations phase. • Disclose updated emergency preparedness and response plan to local emergency services and other relevant external stakeholders (e.g., nearby communities). • Perform continuous monitoring of storm events: e.g., site lock-down securing all equipment and materials. • Site risk assessment for all tasks to be undertaken on the Site. • Communicate hazards and risks to all workers during setting-to-work briefings. • Mandatory PPE, including steel-toe capped boots, overalls, hard hat, hi-vis vest, safety glasses, hard hat AND ear protection, gloves, and dust masks for specific tasks (e.g., welding). • Worker Induction Program. • Worker Code of Conduct. • Training to all workers. • OHS inspection and audits and ensure there is a corrective action process. • Reporting occupational accidents, diseases, and incidents.	O&M Contractor Project Company	Construction phase	Occupational Health and Safety Plan Risk assessment Worker Code of Conduct Worker Induction Program Training logs/ attendance sheets Audit reports Incident reports
Protect community health and safety	O&M works	• Maintain Worker Code of Conduct to be read and signed by all workers on the contract during the induction process. • Security personnel to not be armed unless prior approval from Project Company • Ensure the security plan includes requirements for vetting security guards, training on using force, security guard code of conduct etc. • Employ local security guards and female guards where possible. • Maintain CLO and Community Grievance Mechanism (as developed during construction phase)	O&M Contractor Project Company	Operations phase	Code of Conduct Security Plan CLO in place Community Grievance Mechanism

Objective	Activity	Action	Responsibility	Timescales	Evidence
		• Provide targeted training (including life skills such as leadership and decision-making) and awareness-raising to vulnerable workers such as women.			
Labour wellbeing	O&M works	• Require contractor (O&M contractor) to conform to Company Human Resources (HR) Policy, Code of Ethics, Policy Against Bribery and Corruption, Recruiting Policy, Supply Chain (Procurement) Policy, and Communication Policy. • Contractors to demonstrate functioning HR policies to meet with Lender requirements, ILO core conventions and Uzbek law in contractor contracts. • Ensure all workers on the Project have a written project contract that would clearly specify their terms of employment, consistent with the local labour law and the IFC PS2. The terms of employment should be largely similar for all categories of the Project workers • Implement Worker code of conduct • Establish a Workforce Grievance Mechanism (WGM)and ensure confidentially and anonymity where required. • Ensure appropriate welfare provisions (water, shelter, sanitary facilities, food) at the Site. • Ensure all workers receive the appropriate training as per the training need analysis and matrix developed under the ESMS, including training on the WGM (note specific requirements for working within a substation or on live equipment). • Develop labour reporting statistics for all workers, including identifying labour statistics per worker category	O&M Contractor Project Company	Operations phase	HR Policy and associated documentation Labour contracts with all employees Workers Grievance Mechanism Labour statistics maintained Training records
Emergency preparedness - general	O&M works	• Review and update EPRP for operation phase • Undertake continuous monitoring of weather events to enable an early warning of any high winds, storms, dust storms, or extreme precipitation to enable workers to get to shelter	Project Company O&M Contractor	Operations phase - ongoing	Monthly O&M reporting
Security		• Updated Security Management Plan	Project Company O&M Contractor	Operations phase - ongoing	Monthly O&M reporting
Ensure rehabilitation of disturbed areas is successful.	O&M works	• Implement the rehabilitation requirements of the biodiversity management plan requirement for habitat restoration for no-net loss. • Monitor outputs	Project Company	Operations phase – 5 years or as necessary	Monthly O&M reporting
Ensure livelihoods are not adversely impacted in the long-term	O&M works	• Monitor impacted households for at least one years to ensure they have at least returned to their previous level of livelihood, if not improved their livelihood. • Monitor the implementation of livelihood restoration activities.	Project Company	Operations phase	Monthly O&M reporting Annual M&E report (livelihoods)
Biodiversity	O&M works	• Keep all movements to main asphalt roads wherever practicable • Reduce maintenance work for vegetation around and beneath the panels (often used as a refuge by reptiles, amphibians, invertebrates)	O&M Contractor	Operations phase	Monthly O&M reporting
Stormwater/flood management	O&M works	• A stormwater management plan shall be developed, and an internal drainage system shall be designed as part of the project design based on hydrological and flood studies to reduce the risk and mitigate the impact of potential floods.	O&M Contractor	Operations phase	Storm water management plan
Waste management plan	O&M works	• The O&M contractor will develop a Waste Management Plan in compliance with Bulgarian legislation and GIIP that will also include measures to ensure: • Food/organic waste and recyclables, such as paper, plastic, scrap metal waste, etc. must be appropriately segregated and stored in designated waste bins/containers and periodically deposited in approved disposal areas or sold to licensed recycling companies.	O&M Contractor	Operations phase	Waste management plan

Objective	Activity	Action	Responsibility	Timescales	Evidence
		• Ensure electrical waste (consumables, spare parts and obsolete equipment) and broken solar panels are adequately packed and sent back to the manufacturer or reused in other forms and locations • Generated waste quantities - must be recorded in a separate/dedicated register according to the type of waste and the quantities generated. During the waste transfer process, a waste transfer format (Waste Transfer Format) shall be filled out to determine the respective quantities according to the type of waste leaving the site and the name of the company/entity that will handle these wastes. The Developer shall regularly keep waste data during the operation activity and present/report to the government authorities if required. • Conduct continuous training and education awareness of all project employees regarding waste management practices to avoid and reduce the risks of waste generation and potential impact during the operation phase.			