

ESAP#	ACTION	ENVIRONMENTAL & SOCIAL RISKS (LIABILITY/BENEFITS)	REQUIREMENT (LEGISLATIVE, EBRD ESR, BEST PRACTICE)	RESPONSIBILITY	TIMETABLE	TARGET AND EVALUATION CRITERIA FOR SUCCESSFUL IMPLEMENTATION	STATUS
ESR 1, OS 1, PS 1: Assessment and Management of Environmental and Social Impacts and Issues							
1.1	Obtain Ministry of Environment's approval for the 1,000 Megawatt (MW) photovoltaic (PV) solar power facility coupled with a Battery Energy Storage System (BESS) with a capacity of 600 Megawatt hour (MWh) and cascade its conditions into the construction and operation contracts, as well as the Project Environmental and Social Management System (ESMS).	Environmental and Social (E&S) risk management and legal compliance.	ESR1, PS1 and legal requirement.	Company, with Consultant support.	Prior to first disbursement	Egyptian Environmental Affairs Agency (EEAA) approval.	
1.2	<p>Company will use all reasonable efforts to ensure that an ESIA is completed for its associated facilities, i.e. the Overhead Transmission Lines (OHTL) to be established by the Egyptian Electricity Transmission Company (EETC), that meets EBRD's Environmental and Social Requirements (ESR), IFC Performance Standards (PS), national and local requirements, as well as Good International Industry Practice (GIIP) for the sector, including physical and/or economic displacement impacts.</p> <p>Company to hold consultations with EETC to discuss identified impacts and management measures to support EETC to meet at least objectives of ESRs on best effort basis.</p> <p>Land impacts should be identified clearly and following measures should be discussed with EETC to meet objectives of ESR5:</p> <ul style="list-style-type: none"> • Avoidance of any physical and economic resettlement • Planning of the routing along parcel borders as much as possible to minimise impacts on assets and economic activities • Full compensation of any expropriation at replacement costs • Implementation of effective consultation with affected land owners and employment of a grievance mechanism • Identification and due care of vulnerable groups to avoid any unmitigated residual impacts • Support EETC to close the gaps between EBRD ESR5 and Egyptian local regulations on land acquisition on replacement cost, informal users, consultations and grievance mechanism, livelihood restoration (if impacts are identified). 	Environmental and Social (E&S) risk management and compliance with lender requirements.	ESR1, PS1, ESR 5 and legal requirement.	Company	Prior to construction of Associated Facilities.	<p>Egyptian Environmental Affairs Agency (EEAA) approval.</p> <p>Meeting records with EETC</p> <p>Evidence of support provided to meet ESR5 requirements i.e. records of meetings, additional services support, record of grievance management and consultation support.</p>	

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1.3	<p>Develop and implement an ESMS for the Project in line with EBRD ESR1, ISO 14001 (Environmental Management) and ISO 45001 (Occupational Health and Safety) requirements. The ESMS should include, as a minimum, the following elements:</p> <ul style="list-style-type: none"> • E&S Policy. • Procedures for identifying E&S risks and impacts. • Procedures and criteria for assessing the past performance of potential contractors with regard to employment and occupational health and safety. • A procedure to include legal covenants, E&S requirements and specifications for tenders and contracts, including requirements for these to be cascaded to sub-contractors as well as procedures for supplier/contractor verification and auditing. • Management programs to control identified E&S risks and impacts. • Training matrix to cover the implementation of Environmental and Social Management Plans (ESMPs) and EBRD/IFC requirements, in particular labour management and subcontractor monitoring. • Defined roles and responsibilities, as well as requirements to improve the organisation's competency in implementing the ESMS. • Stakeholders Engagement Plan (SEP) and procedures for its implementation. • Workers' Grievance Mechanism. • External Grievance Mechanism. • Contractor Management Plan. • Monitoring and reporting procedures. 	Improved E&S performance and compliance with local and lender requirements.	ESR1, PS1	Company, with Consultant support.	Prior to construction. Prior to operation.	ESMS in place and approved by all lenders and Company.	

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1.4	<p>Develop a site-specific ESMP for the Project's construction and operation phases, including the following components as a minimum:</p> <ul style="list-style-type: none"> Regulatory limits. Objectives. Roles and responsibilities of management and site teams. Mitigation measures. Key performance indicators (KPIs). Relevant Monitoring parameters and frequencies of monitoring. Budgets, where applicable <p>ESMP to include the following sub-management plans as a minimum:</p> <ul style="list-style-type: none"> Resource Efficiency Management Plan (addressing water, fuel, electricity consumption). Air Quality Management Plan (construction phase only). Noise Management Plan (construction phase only). Non-hazardous and Hazardous Waste Management Plan (including the establishment of a hazardous waste storage area according to Law 202/2020 and Law 4/1994). Wastewater Management Plan. Health and Safety Management Plan. Traffic and Access Management Plan. Contractor Management Plan. Hazardous Materials and Substances Management Plan. Emergency Preparedness and Response Plan, including the integration of community in the plan. Workers' Influx Management Plan Accommodation Management Plan Stakeholder Engagement Plan (including grievance mechanism) Decommissioning and Site Rehabilitation Plan <p>Ensure the appointed sub-contractors acknowledge and adopt the Project-specific ESMP. The Project Company, in collaboration with the Engineering, Procurement, and Construction (EPC) Contractor and the Operations and Maintenance (O&M) Contractor, will submit its Construction ESMP (CESMP) and Operation ESMP (OESMP), respectively, before mobilisation/O&M for lender no-objection.</p>	E&S risk management.	ESR1, PS1	<p>Company to include framework ESMPs in the EPC contract</p> <p>Contractor to develop site-specific ESMPs.</p>	<p>30 days prior to construction.</p> <p>30 days prior to operation.</p>	<p>Construction ESMP.</p> <p>Operation ESMP.</p>	

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1.5	<p>As a minimum, the Project will appoint and retain the following qualified E&S resources for the construction phase of the project and as long as there are material risks during operations:</p> <ul style="list-style-type: none"> a. Sponsors: An E&S Manager and QHSE Manager - Individuals shall have at least 10 years of experience of implementation of IFI requirements in large construction projects, across multiple geographies, contractor management and reporting to IFIs, capacity building and training of E&S and HSS staff <p>1.1.2 Ensure the Project Company appoints/maintains sufficient E&S and H&S resources during construction and operations to ensure PR compliance. and as a minimum retains the following qualified E&S resources for the construction phase and as long as there are material risks during operations:</p> <ul style="list-style-type: none"> b. E&S Supervisor c. HSE Supervisor d. Social Specialist/community liaison officer with previous experience on community and stakeholder engagement, grievance management implemented at IFI standards e. Labour Manager with previous experience on HR and labour management in accordance with national legislation and IFI standards <p>Ensure the Project Company:</p> <ul style="list-style-type: none"> f. Engage a competent gender/ GBVH advisor who will provide training and support the CLO for community-related GBVH issues and Labour Manager who will be responsible for assessment and addressing retaliation, harassment risks and issues at all project sites and worker accommodations. g. Engage a labour advisor with experience in implementing PR/PS2 requirements including in the construction phase of major Project (if the labour managers do not have such experience) h. Assign suitably qualified female employee(s) to execute portions of social management plans including stakeholder engagement and grievance management for female affected people and community members. <p>The role and responsibilities of each position shall be defined in the Project's HSSE MS.</p> <p>Ensure all newly appointed E&S staff receive adequate training on the Project's E&S plans and IFI requirements</p>	E&S capacity commensurate with Project risks and impacts	ESR1, PS1 and legal requirement.	Company and contractors.	Prior to construction.	<p>Organisational chart for construction and operation phases showing HSE, labour and stakeholder engagement roles.</p> <p>Completed training certificates.</p> <p>Training attendance register.</p>	
1.6	<p>The Project will establish a Health, Safety and Environmental (HSE) department and Occupational Health and Safety (OHS) Committee to comply with the provisions of Ministerial Decree 134/2003 when their workforce reaches 50 employees or more. The OHS Committee will receive basic OHS training, meet on a monthly basis, and maintain monthly meeting minutes as is required by Ministerial Decree 134/2003.</p>		ESR1, PS1 and legal requirement.	Company and contractors.	Prior to and during construction.	<p>Committee established</p> <p>Minutes of meetings</p>	

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1.7	<p>Contractually require the contractors to appoint sufficient E&S and HR staff to oversee the Project's E&S management prior to site mobilisation and at all times during construction, in line with Egyptian E&S laws and regulations, and EBRD's ESRs and IFC PSs. This must include but not be limited to the following site-based resources:</p> <ul style="list-style-type: none"> ▪ HSSE Manager ▪ H&S Lead ▪ Social Specialist ▪ Environmental Specialist ▪ HR manager and ▪ Labour Compliance Officer <p>The above will be supplemented by sufficient supervisor/officer positions level based on the number of workforce. The manager and specialists should have prior experience of implementing large scale construction projects to IFI Standards which will be verified by the prior to approval.</p> <p>The Company will approve the E&S and H&S resources of EPC and O&M and their sub-contractors prior to construction and operation, respectively.</p>	HSE and labour personnel	ESR1, PS1 and legal requirement.	Company.	Prior to construction.	Contractor organisational chart and roles and responsibilities.	
1.8	<p>Develop and implement a Contractor Management Plan that guides monitoring for ongoing compliance with E&S requirements.</p> <p>Appoint separate competent international auditors to undertake independent H&S and labour and working conditions site audits (including as required site inspections, interviews with key staff, interviews with representative sample of contractor and subcontractor workers, review of local employment status and documentation reviews and observations at site and accommodation camps) for the Company. The audits shall be undertaken quarterly throughout the construction period until construction workforce demobilisation. Monthly site-based verification audits shall be conducted by an auditor acceptable to the Lenders (for Contractors which Lenders considers higher-risk, this must be independent of the Project and Sponsors, in other cases with prior agreement from Lenders, Company corporate resources independent from the day to day Project management can be acceptable) , to verify progress on closing actions from quarterly audits and identify any other issues. Annual audits will be performed thereafter for the first 3 years of operation. In the event of a major non-compliance, the frequency of all audits will be increased as agreed with Lenders or in the event of recurring satisfactory performance, may be reduced as agreed with EBRD.</p> <p>The first audit will constitute the construction readiness audit, to confirm readiness of the H&S, HR and labour management systems and permits, adequate resources and staff capacity to manage EPC Contractor and subcontractors, to ascertain measures and systems are in place for labour influx, worker accommodation, including fire and life safety. A construction completion audit will be performed towards end of construction focusing on demobilisation risks.</p>	Enhanced E&S performance.	ESR1, PS1	Company.	<p>Prior to construction.</p> <p>Prior to operation.</p>	<p>Contractor Management Plan</p> <p>ToR for auditors reviewed by LESA and no-objection given</p> <p>Audit Reports</p>	

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1.9	<p>Adopt Infinity Power Holding's supply chain management system to the Project, enabling the Project to include E&S selection criteria and to include processes for taking action on issues identified. Selection criteria are to consider the past performance of suppliers, contractors, or intermediaries with regard to labour management (i.e., child labour, forced labour, etc.) and occupational safety and health, and their current capacity to implement the requirements of EBRD's ESR2 and IFC PS2.</p> <p>With respect to solar and BESS supply chains, the management system will require:</p> <ul style="list-style-type: none"> • Responsible Sourcing Policy. • Supplier Code of Conduct. • Mapping and risk assessment of solar module suppliers and sub-supplier. • Define specific measures including disengagement to be implemented in case the mapping reveals potential exposure to forced labour. • Inclusion of appropriate clauses in procurement notices and contracts with solar and BESS contractors and suppliers on labour risks and management thereof in line with Project's loan agreement forced labour provisions. • Self-declarations, legal representations/warranties or similar, by solar and BESS contractors, suppliers and sub-suppliers regarding labour risks. • An audit programme based on risks; at the minimum social assessments/labour audits of first tier solar supplier(s) where risks are identified. • Requirements for traceability protocols from solar suppliers down to polysilicon (and metallurgical level grade silicon level and for BESS suppliers at Tier 1, 2, 5 and 5 level where risks are identified). • When possible, requirements for solar and BESS suppliers to conduct (or provide) deep traceability audits of their supply chains. • Requirements for chain-of-custody certification from suppliers. 	Supply chain risk assessment.	ESR1, PS1, EU Guidance on Due Diligence for EU Businesses to Address the Risk of Forced Labour in Their Operations and Supply Chains	Company	<p>SCMS in place and evidences of the system presented before first disbursement</p> <p>Actions on supplier mapping and supplier management prior to procurement</p> <p>And verification related actions during manufacturing</p> <p>Audits and monitoring as per SCMS</p>	Evidence of implementation of supply chain management system (due diligence reports, risk assessment, contract clauses, labour audits reports, signed CoC, declarations, supply chain maps and traceability etc.)	

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1.10	<p>Tender documentation for the contractor for the Project is to include E&S and OHS requirements. These will include as a minimum:</p> <ul style="list-style-type: none"> Complying with, and explicitly referencing, local environmental, health, safety and labour laws and regulations and EBRD ESRs and IFC PSs. Preparation of a project-specific ESMS. Ensuring sufficient HSE and labour management personnel are present onsite. E&S and OHS reporting requirements, including requirements for reporting of serious incidents and training of workers. Ensuring all of the above minimum requirements apply to all subcontractors. Ensure key suppliers are not located in regions designated as high-risk for systemic human-rights abuse according to EU Forced Labour Guidance <p>Develop a Local Procurement plan which includes the following:</p> <ul style="list-style-type: none"> Transparent procurement policies Prohibited activities (e.g., illegal sourcing of water, soil, diesel and other materials) Rules for labor brokers and legal requirements Casual labour daily wage ranges, terms of employment and working conditions Definition of work packages and timelines (clear delineation of supply contracts and construction contracts) Opportunities for small and medium enterprises and vulnerable groups Contractor registration process, eligibility requirements Tender process, including platforms for invitation, tender rules, clarification queries, bid submission, award, contract signing Evaluation criteria (see below) and reasons for rejection Grievance/conflict resolution mechanism Acknowledgement of attendees <p>Establish a bid evaluation committee comprised of members from the sponsor and EPC contractor to evaluate all tenders. Committee members to include:</p> <ul style="list-style-type: none"> Senior procurement representative Technical evaluator (depending on scope) Commercial evaluator E&S representative Legal evaluator Independent observer (must not be the same observer for every evaluation) <p>Project Company and EPC Contractor to organize at least three well-advertised workshops in Menya (at accessible locations and times) to present to the local community and local contractors the draft local procurement plan, seek feedback and finalise</p>	E&S risk management.	ESR1, PS1	<p>Company to prepare draft</p> <p>EPC to finalise plan</p>	<p>Prior to initiating the tendering process for tendering documentation.</p> <p>Before end of disclosure period for Draft Procurement Plan and workshops.</p> <p>Final Procurement Plan and implementation post-EPC contract award</p>	<p>Tender documentation including E&S requirements and approved by lenders.</p> <p>Workshop agenda and invitations and outcomes report</p> <p>P</p>	
1.11	Prepare environmental register and hazardous materials and waste register according to Law 4/1994 and Law 202/2020.	Legal compliance.	Legal requirement	Company.	<p>From start of construction and updated continuously.</p> <p>During operation.</p>	<p>Environmental register.</p> <p>Hazardous materials and waste register.</p>	

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1.12	The Project will ensure that a Lenders’ Environmental and Social Advisor (LESA) is contracted to undertake independent E&S monitoring (including a site visit) of the Project quarterly during construction and bi-annually during the first year of operation. The LESA will have a duty of care to the lenders and issue a report after each site visit, describing the Project’s E&S performance, compliance with EBRD’s ESRs/IFC’s PSs, the implementation of this ESAP and the compliance of the client with the E&S covenants in the financing agreements. LESA will also conduct an additional, stand-alone detailed labour and working conditions audit at the peak of the construction (specific date to be agreed with Lenders). Corrective actions to be identified and agreed with the Company, if any.	E&S reporting.	ESR1, PS1	Company.	LESA E&S monitoring every quarter during construction, first visit to take place within 1 month of contractor mobilisation LESA E&S monitoring bi-annually during first year of operation	E&S monitoring reports satisfactory to lenders.	

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ESR 2, OS 2, PS 2: Labour and Working Conditions							

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2.1	<p>Project to adopt and implement the Company's HR Policy in line with national law, EBRD ESR2 and IFC PS2. HR policy and requirements will apply to all project contractors in line with ESR2. HR policy and associated procedures and plans to include a Local Recruitment Management Plan and training strategy. Implementation will be supported by the relevant contractors and apply to contracts and their sub-contractors. The HR Policy should at least cover the following:</p> <ul style="list-style-type: none"> • Approach to managing the Project workforce. • Code of Conduct • Local recruitment procedure ensuring that priority for job opportunities are targeted for local community members to the greatest extent possible throughout the construction and operation phase for skilled and unskilled jobs. • Human rights. • Working conditions, terms of employment overtime management. • Child labour and forced labour. • Equal opportunities and non-discrimination. • Prevention of and adequate response to Gender-Based Violence and Harassment (GBVH) and Sexual Exploitation, Assault and Harassment (SEAH). • Oversight provided of contractor policies/procedures especially on monitoring of payments and overtimes. • Regulation and management of worker accommodation in line with IFC/EBRD Guidelines for Worker Accommodation • Effective worker grievance mechanism responsive to GBVH incidents with a safe and survivor centered approach. • Induction and training requirements for all workforce of the project 	Labour risk management.	ESR2, PS2	Company.	<p>Prior to construction.</p> <p>Prior to operation.</p>	<p>Company HR policy</p> <p>Diversity, Equity, Inclusion, and Belonging (DEIB) Policy</p> <p>Human Rights Policy</p>	
2.2	<p>Ensure every worker engaged in the Project (including casual workers) will receive a contract that specifies various details, including:</p> <ul style="list-style-type: none"> • the nature and type of work, as well as job responsibilities, • the wage and other compensations to be paid (i.e. social security/insurance payments) and timing of payment, • mandatory contributions such as medical, life, and social insurance, along with other agreed-upon benefits in both monetary and non-monetary forms, • the duration of the contract, and • any additional necessary information including grievance channels and disciplinary procedures in line with the requirements of ESR2. Contracts shall be issued in Arabic and the employee's native language for non-Egyptian workers, if any, and guarantee equal conditions for migrant workers. 	Labour risk management.	ESR2, PS2	Company and contractors.	<p>Prior to construction works commencing.</p> <p>Ongoing during construction and operation.</p>	Project employment contracts verified in external monitoring	

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2.3	<p>Develop a Labour Management Plan which ensures that all workers covering EPC and all subcontractors are engaged in accordance with Egypt's labour laws and regulations and good international practice. The labour management plan should:</p> <ul style="list-style-type: none"> • Commit all Project Parties (including contractors and sub-contractors) to meeting national regulatory, ESR2 and PS2 requirements during construction and operation through contractual requirements. • Define key working conditions, including transparent recruitment and contracting arrangements, fair and timely payment of wages, regulated working hours and overtime, leave entitlements, and mandatory social insurance coverage. • Ensure non-discrimination and equal opportunity, freedom of association, prohibition of child and forced labour, and the availability of a worker grievance mechanism. • Confirm that all workers have unrestricted access to adequate sanitation and welfare facilities, potable drinking water, and appropriate facilities for food preparation, storage, and eating. • Prioritise the recruitment of local labour, in coordination with the labour office. • Commit to ensuring that wages that meet or exceed national minimum wage requirements and are fair and equitable, taking into account qualifications, experience, job responsibilities, and prevailing market rates. • Ensure equal terms of employment and working conditions for migrant workers and women, including equal pay for equal work and access to the same benefits and protections. • If recruitment intermediaries will be used by Company and EPC (or their subcontractors), ensure that they meet EBRD ESR2, local labour law and that they will apply Labour Management Plan as well as Local Employment Plan of the Project. Conduct prior audits/assessment to ensure compliance status of these agencies before recruiting them. 	Labour risk management.	ESR2, PS2, National Labour Law	Company and contractors.	<p>Prior to construction.</p> <p>Prior to operation.</p>	Labour Management Plan.	

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2.4	<p>Conduct accommodation availability and impact assessment:</p> <ul style="list-style-type: none"> accommodation requirements for the Project to determine the approximate number and categories of workers requiring accommodation and availability of housing in towns (avoiding smaller settlements as noted in the ESIA) and feasible transport distances considering road conditions and working hours. site-specific E&S impacts of available accommodation including on any host community which determines, as applicable, that the capacity of the existing infrastructure and services and of the community can host predicted workforce numbers without impacts on community health, safety or disturbance or quality of life (including GBVH, inflation of local goods and services etc) and on ability of accommodation to comply with IFC and EBRD workers' accommodation guidelines Potential cumulative impacts from any other projects/activities including seasonal workers <p>Based on this assessment determine the requirements for minimum number of on-site accommodation facilities and incorporate requirements in to the contract of EPC contractor.</p> <p>EPC to develop an Campsite and Accommodation Management Plan to ensure accommodation facilities to be provided to blue and white collar workers meet the IFC/EBRD's Workers' accommodation: processes and standards, to the extent feasible.</p> <p>The plan should define minimum standards for location, design, occupancy levels, privacy, ventilation, lighting, fire safety, emergency preparedness, sanitation, potable water supply, wastewater and solid waste management, housekeeping, security, and access to medical services to apply to the accommodation facilities.</p> <p>The plan should explicitly prohibit the use of accommodation within nearby villages or, where unavoidable, establish strict controls for selection of such accommodation to prevent adverse social impacts such as rent inflation or pressure on local services, GBVH or others as noted above. The inspection programme of accommodation units should establish inspection frequency, roles and responsibilities, compliance checklists, corrective action tracking, and reporting mechanisms to verify ongoing compliance and timely remediation of identified gaps. The plan should be cascaded to contractors providing their workforce with accommodation for this project.</p>	Labour risk management.	ESR2, PS2, IFC/EBRD Guidance on Worker Accommodation	Company and contractors.	<p>Before end of the disclosure period for accommodation availability assessment</p> <p>Requirements are integrated into EPC contract before signing the contract</p> <p>Prior to mobilisation for accommodation management plan</p>	<p>Accommodation assessment</p> <p>Accommodation Management Procedure and Contractors' Campsite and Accommodation Management Plan</p>	

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2.5	<p>Develop and implement a formal internal Grievance Mechanism for the Project as per EBRD’s ESR2 and IFC PS2, ensuring access to the grievance mechanism by all Project workers, including those employed/engaged by contractors and subcontractors.</p> <p>The mechanism should define clear and transparent procedures for submission, receipt, assessment, investigation, and resolution of grievances, with multiple confidential entry points (e.g. written, verbal, hotline, or digital channels). It should ensure non-retaliation, anonymity where requested, and protection of complainants’ rights. Complaint boxes should be accessible but also be out of sight of CCTV. It should have specific measures to accommodate GBVH complaints in a sensitive and safe way with a survivor centered approach.</p> <p>The procedure should specify roles and responsibilities, response timelines, escalation pathways, documentation and recordkeeping requirements, and communication of outcomes to complainants. The grievance mechanism should be communicated to all workers through induction, training, and visible postings in relevant languages, and its effectiveness should be monitored through regular reporting, trend analysis, and management review to support continuous improvement. Provide monthly grievance statistics to lender.</p>	Grievance management.	ESR2, PS2	Company and contractors.	<p>Prior to construction works commencing.</p> <p>Ongoing during construction and operation.</p>	<p>Worker Grievance Mechanism in place.</p> <p>Grievance register maintained.</p>	

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ESR 3, OS 3, PS 3: Resource Efficiency and Pollution Prevention and Control							

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3.1	Develop and implement Air Quality and Noise Management Plans for the construction phase. The Plan should include measures to minimise emissions and noise impacts on workers and nearby communities, monitoring protocols, mitigation measures (e.g., dust suppression, equipment maintenance, noise barriers), required measurements and monitoring measures, and reporting mechanisms.	Air and noise quality management.	ESR3, PS3	Company and construction contractor.	Prior to construction.	Air Quality and Noise Management Plan.	
3.2	<p>Develop and implement a Waste Management Plan and Wastewater Management Plan meeting the requirements of Egyptian laws and regulations and the EBRD ESR3 and IFC PS3.</p> <p>The Waste Management Plan should cover:</p> <ul style="list-style-type: none"> the segregation, storage, handling, recycling, and safe disposal of hazardous waste (HW) and non-hazardous waste (NHW) s in line with applicable requirements. development of dedicated waste storage area for the temporary and segregated storage of HW and NHW pending offsite disposal by the licensed contractor. The area should have restricted access, clearly segregated storage for HW and NHW with proper labeling and signage, impermeable flooring, weather protection to prevent exposure to rain and wind, adequate ventilation, spill containment measures for liquid waste, and fire safety provisions. The storage area should be appropriately sized to accommodate all waste generated on-site. Require PV panels suppliers to meet the key objectives of European Union's (EU) Waste Electrical and Electronic Equipment (WEEE) directive in terms of collection, treatment, recovery and sound disposal of WEEE at best support efforts, considering the relevant INCOTERM (set of internationally recognized rules which define the responsibilities of the buyers and sellers in the export transaction — defining obligations, costs and risks involved in the delivery of goods) and if commercially feasible (at the Company's discretion): <ul style="list-style-type: none"> Panels that are delivered broken during the construction period must be disposed in a facility with the technical capacity to recycle their components, at the expense of the supplier. The supplier must provide a proof of delivery of the broken panels to such facility. Panels that are broken or out of order during construction or operation must be disposed of in line with the principles of the WEEE directive at the expense of the supplier. <p>The Wastewater Management Plan should include measures to:</p> <ul style="list-style-type: none"> prevent contamination of soil and groundwater, ensure proper collection and discharge of effluents, and define monitoring and emergency response procedures. <p>Engage a licensed contractor for the offsite disposal of all waste streams, ensuring that the contractor holds the necessary licenses from the EEAA and the Waste Management Regulatory Authority (WMRA) in accordance with Law 4/1994 and Law 202/2020. Waste contractors should provide waste manifests for each disposal trip in line with the requirements of Law 202/2020. All waste and wastewater contractors must have GPS tracking devices installed.</p> <p>Both plans should clearly define roles and responsibilities, monitoring protocols, reporting requirements, and corrective actions to ensure effective implementation. The plans should also be supplemented by generation tracking registers to track the amount of generated waste.</p>	Waste management.	ESR3, PS3	Company and contractors.	<p>Plan in place prior to construction.</p> <p>Implemented during construction and operation.</p>	Waste and Wastewater Management Plan.	

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3.3	<p>Establish a hazardous materials storage warehouse in line with Egyptian laws and regulations and the EBRD ESR3 and IFC PS3. The warehouse must include the following features as a minimum:</p> <ul style="list-style-type: none"> Controls to limit access of unauthorized persons. Impermeable flooring and appropriate drainage and sump pits to collect any spilled liquids. Use of spill containment pallets or other appropriate secondary containment methods. Drums to be clearly labeled with information about their contents, including the type of chemicals, hazards associated with the material, and any other relevant information. Display handling instructions and safety signage. Install emergency response equipment, such as fire fighting extinguishers (type depending on material stored), absorbents and other spill. <p>Develop and implement a Hazardous Materials Management Plan that establishes requirements for the safe procurement, unloading, handling, and both temporary and long-term storage of all hazardous materials and chemicals used on-site. The plan should include procedures for labeling, segregation of incompatible substances, use of secondary containment, spill prevention and response measures, PPE requirements, and training for all personnel handling hazardous materials. It should also define roles and responsibilities, monitoring and inspection protocols, emergency response procedures, recordkeeping, and corrective action tracking.</p>	Hazardous material management.	ESR3, PS3 and legal requirement	Company and contractors.	During construction and operation.	<p>Hazardous Materials Management Plan.</p> <p>Permanently established hazardous material storage area meeting Egyptian regulatory requirements and international good practice.</p>	
3.4	<p>Develop and implement a Water Management Plan, ensuring that water sourced for the Project is from a legitimate source and has no impact on the local communities in the surrounding area. The Water Management Plan will include details on the different water uses, source of water, quantities required, water quality requirements (drinking, sanitary, construction, dust suppression), monitoring and tracking requirements.</p> <p>Prefer non-potable sources where possible.</p> <p>For solar panel cleaning, a waterless solution must be preferred as noted in the ESIA.</p> <p>If this is not the case, submit to the lenders approval a "best available technology" study comparing waterless and with- water solutions from a technical-economic and E&S perspective: only renewable water sources should be envisaged (not fossil aquifers) and a hydrogeological study and water mass balance should be included to confirm the absence of water use competition with local agricultural or community needs, taking into account climate change.</p>	Pollution control	ESR3, PS3	Company and Contractors	<p>Prior to and during construction</p> <p>Study submitted to Lenders at least 3 months prior to operation</p>	<p>Water Management Plan.</p> <p>If required, Study including Water balance receives no-objection from Lenders</p>	

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ESR 4, OS 4, PS 2: HEALTH, SAFETY AND SECURITY							
4.1	Company to ensure that the construction and operation main contractors adopt the Occupational Health and Safety Management Plan (OHSMP) during the construction and operation phases, addressing key impacts such as electrocution, extreme heat and heat stress, working at height, lifting, etc. and including a commitment to implementing a permit to work system, incident and investigation and reporting procedure, conducting OHS risk assessments.	Worker health and safety.	ESR4, PS2 and legal requirement	Company and contractors.	Prior to construction. Prior to operation.	OHSMP.	
4.2	Establish a clinic on-site with the presence of a nurse and physician. Adequate arrangements must be made to have an ambulance available at the site 24/7. The clinic should be equipped with essential medical equipment, including an Automated External Defibrillator (AED), stretchers, backboards, immobilization equipment, a sphygmomanometer, an oxygen tank, a refrigerator, antivenom, and any other necessary medical equipment. Additionally, the clinic should be stocked with antivenom to address snake and scorpion bites, as well as cold packs to address heat stress.	Worker health and safety.	ESR4, PS2 and legal requirement	Company and contractors.	Prior to construction. Prior to operation.	Clinic established onsite.	
4.3	Develop and implement a Workers' Influx Management Plan to identify, assess, and manage potential HSE and security risks associated with the influx of construction and operational workforce. The plan should define mitigation measures to manage accommodation, worker conduct, community interactions, labour standards, grievance handling, and pressure on local services (including water utility services), potential cumulative impacts including with other season workforce in the area and assign clear roles and responsibilities, monitoring requirements, and reporting mechanisms to ensure effective implementation and compliance.	Community health and safety.	ESR4, PS2 and legal requirement	Company and contractors.	Prior to start of construction or prior to first disbursement whichever is earlier	Worker Influx Management Plan.	

4.4	<p>Project to commission a site-specific Traffic Impact Assessment (TIA) for all routes proposed to be used to transport materials, equipment and workers to and from the site. The TIA must explicitly account for the seasonal variation in baseline traffic on neighbouring agricultural access roads — including peak harvest-period (May-July) flows of slow-moving agricultural trucks. Key elements of the TIA to include:</p> <ul style="list-style-type: none"> • Baseline traffic surveys including record of existing load and condition of the roads and vibration sensitive receptors • Description of project vehicle numbers and types anticipated to be used • Access routes from communities sourcing the workforce • Road infrastructure conditions and the impact this may have on personnel transport • Agricultural related traffic associated with Canal Sugar, 1.5 Million Feddan Project and solar power projects within the NREA concession (where information is available) • Project traffic forecast with and without traffic from neighboring agricultural projects, solar power projects in NREA concession • Consultation with neighboring farms where possible • Impact assessment including traffic from project and neighboring agricultural and solar projects including identification of sensitive receptors and impacts on them • Mitigation measures including both preventive and compensation/restoration measures • Monitoring measures <p>The ToR for the TIA and the completed TIA must be reviewed and accepted by the LESA and lenders. Requirements and measures in TIA should be integrated into E&S requirements of the EPC contractor.</p>	Community health and safety	ESR 4	Company	Prior to start of construction or prior to first disbursement whichever is earlier	Traffic Impact Assessment	
4.4	<p>Develop and implement a comprehensive Traffic and Road Safety Management Plan in compliance with TIA and Egyptian Traffic Rules and Regulations for the transport of Project materials and workers. This plan should include actions based on requirements in the TIA on mitigation, management and monitoring measures including but not limited to a systematic vehicle inspection and maintenance program, training program, establishment of transportation-related KPIs and a monitoring program, a tracking system for traffic violations to identify areas for improvement, special measures for sensitive receptors identified in TIA, interfaces with grievance mechanism and a journey management plan that covers all aspects of road transport safety in addition to a training and capacity validation program.</p>	Community health and safety.	ESR4, PS2 and legal requirement	Company, EPC and contractors.	Prior to mobilisation Prior to operation.	Traffic and road safety management plan.	

4.5	<p>Develop a Project-specific Emergency Preparedness and Response Plan (EPRP) that identifies potential emergency scenarios, including flooding, extreme heat, and earthquakes, and assesses their associated risks to establish tailored response procedures for each. The plan should:</p> <ul style="list-style-type: none"> • Define training requirements for specialized emergency response teams. • Maintain a list of onsite and offsite key emergency contacts • Provide clear guidelines for coordination with government authorities, including emergency services. • Include detailed maps of emergency equipment and facilities, such as first aid stations, automated external defibrillators, firefighting gear, spill response tools, and personal protective equipment, together with standard procedures for their use. • Provide Evacuation maps which clearly indicate evacuation routes and designated assembly points. • Schedule regular emergency drills that cover relevant emergency scenarios, and establish protocols for decontamination and immediate actions to mitigate, contain, and minimize pollution within the Project's boundaries. • Integrate measures to engage and inform the local community, ensuring coordinated preparedness and response across all stakeholders Include BESS fire simulations, hazardous material spill drills, and coordination with local emergency services. 	Emergency response.	ESR4, PS2 and legal requirement	Company and contractors.	Prior to construction. Prior to operation.	Emergency preparedness and response plan.	
4.6	<p>Develop a Security Management Plan in line with EBRD ESR4 and IFC PS4. The plan should define the security risk assessment process, roles and responsibilities of in-house and contracted security personnel, rules of conduct and use-of-force principles consistent with proportionality and necessity with a mandate to deliver relevant trainings, and procedures for recruitment, vetting, training, and supervision of security staff. It should also establish requirements for incident reporting and investigation, coordination with public security forces where applicable and monitoring and review arrangements to ensure ongoing compliance and continuous improvement. Security personnel shall be trained in the Voluntary Principles on Security and Human Rights.</p>	Security risk management.	ESR4, PS4	Company and contractors.	Prior to construction. Prior to operation.	Security Management Plan	

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ESR 6, OS 6, PS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES							
6.1	Undertake updated avifauna surveys during the autumn migration period to establish current baseline conditions within the, OHTL and associated Aol, to inform mitigation measures.	Biodiversity Risk Management.	ESR6, PS6	Company	Autumn Migration period	Avifauna Survey.	
6.2	<p>The Company will collaborate with EETC and</p> <ul style="list-style-type: none"> Ensure installation of bird flight diverters on the OHTL (where it crosses agricultural lands including a 1km buffer and as informed by the autumn migration survey – 6.1) and ensure proper insulation of the connections; Ensure application of electrocution prevention measures, Ensure the development and implementation of a postconstruction fatality monitoring (PCFM) program for the OHTL. In the event of bird fatalities, implement adaptive management measures and for priority bird species offset measures as required. agree roles and responsibilities with EETC as required to ensure the above 	Biodiversity Risk Management.	ESR6, PS6	Company	<p>Measures agreed with EETC 3 months prior to the start of construction; post-construction completion report</p> <p>PCFM – developed 1 month prior to line stringing, implementation thereafter</p>	<p>BFD and anti-electrocution measures installed during construction</p> <p>Postconstruction fatality monitoring program</p>	

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ESR 8, OS 8, PS 8: CULTURAL HERITAGE							
8.1	Commission a suitably qualified archaeologist with specific regional survey knowledge to undertake a survey of the Project site and confirm that there is no tangible cultural heritage.	Cultural heritage protection	ESR8, PS8	Company	<p>Survey completed prior to end of disclosure period</p> <p>Results incorporated into national EIA and ESIA updated post disclosure as required</p> <p>Additional mitigations developed and implemented prior to start of construction if required</p>	Archaeological verification report	
8.2	Develop a Chance Find Procedure as part of the site construction management plan to address the unexpected discovery of cultural heritage artefacts/sites during construction. The procedure should define its scope and legal basis, assign clear roles and responsibilities, and establish immediate response actions, including work stoppage, securing the area, and prohibiting disturbance of the find/site. It should also set out notification and reporting requirements to relevant authorities, procedures for assessment by qualified specialists, conditions for resuming works, and requirements for worker training, documentation, and monitoring to ensure effective implementation and compliance. Ensure an archaeologist is on call during groundworks for the proposals. The chosen archaeologist should be acceptable to the Ministry of Tourism and Antiquities and have the appropriate knowledge of the likely archaeological potential specific to the Project Site.	Managing potential chance finds that may indicate previously unknown and unrecorded archaeological sites.	ESR8, PS8	Company and construction contractors.	<p>Procedure in place prior to any earthworks.</p> <p>Procedure implemented during earthworks.</p>	Chance Find procedure in place and implemented.	

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ESR 10, OS 10, PS 1: INFORMATION DISCLOSURE AND STAKEHOLDER ENGAGEMENT							
10.1	Implement the Project Stakeholder Engagement Plan (SEP) to ensure systematic, transparent, and inclusive engagement with all relevant stakeholders. The SEP should include a public grievance mechanism that is accessible, culturally appropriate, and clearly communicated to affected communities. The SEP should also define procedures for regular stakeholder communication, consultation, disclosure of project-related information, and periodic review to ensure engagement effectiveness and continuous improvement in line with EBRD ESR10 requirements.	Stakeholder engagement and information disclosure.	ESR10, PS1	Company	During all project phases.	Supporting documentation (e.g., stakeholder meeting logs, minutes of meeting, etc.) demonstrating implementation of the SEP and public grievance mechanism implemented and records maintained.	
10.2	Develop and implement a grievance mechanism, including options for anonymous and sensitive complaints, that has a survivor-based focus for GBVH/SEAH for dealing with GBVH and SEAH related grievances linked to the Project as defined in the Project SEP to be handled by trained staff. Keep a log of the complaints and track resolution process.	External grievance mechanism.	ESR10, PS1	Company and contractors.	During all project phases.	Community Grievance Mechanism in place.	
10.3	Develop and implement a Corporate Social Responsibility (CSR) plan, with target initiatives, allocated budget, implementation schedule and appropriate resources. The CSR plan should be informed by engagement with key stakeholders, including local communities (including marginalised and vulnerable groups) as well as local and regional authorities. The CSR plan must adopt a gender-based lens to ensure that initiatives are gender-representative and aimed at empowering women in a culturally sensitive approach.	Corporate social responsibility.	Best Practice	Company	Prior to operation	CSR Plan.	

