

PUBLIC

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	<p>Obtain ministry of environment's approval for the 500 Megawatt (AC) coupled with a Battery Energy Storage System (BESS) with a capacity of 100 Megawatt hour and cascade its conditions into the construction and operation contracts, as well as the Project Environmental and Social Management System (ESMS).</p> <p>Prior to initiating Phase 2, ensure that an ESIA is conducted that meets Lender E&S requirements (including meaningful consultation), national and local requirements, as well as good international practice for the sector. The ESIA will consider the project and associated facilities, as well as cumulative impacts, as required by Lenders E&S requirements. This includes consideration of associated overhead transmissions lines, roads, etc.. Obtain the Egyptian Environmental Affairs Agency approval for Phase 2 prior to any construction activities and cascade all conditions into construction/operation contracts and the Project ESMS. Submit approval and conditions to all lenders prior to any construction activities of the respective phase.</p> <p>Obtain EETC ESIA/ESMP; ensure adoption of avifauna mitigation; monitor and report annually.</p>	Environmental and Social (E&S) risk management and legal compliance.	ESR1, OS1, PS1 and legal requirement.	Company, with Consultant support.	Prior to construction of each respective phase.	Egyptian Environmental Affairs Agency (EEAA) approval.	
1.2	<p>Develop and implement an ESMS for the Project in line with EBRD ESR1, AfDB OS1, ISO 14001 (Environmental Management) and ISO 45001 (Occupational Health and Safety) requirements and building on the existing ESMS for Obelisk. 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 for tenders and contracts, 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 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. • 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, OS1, PS1	Company, with Consultant support.	<p>Prior to construction.</p> <p>Prior to operation.</p>	ESMS in place and approved by all lenders (EBRD, EIB, AfDB, etc.) and Company. and Company.	

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1.3	<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 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 emergency preparedness and response plan. 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 EPC Contractor and O&M Contractor will submit its CESMP and OESMP before mobilisation/O&M for lender no-objection</p>	E&S risk management.	ESR1, OS1, PS1	Company and contractors.	<p>30 days prior to construction.</p> <p>30 days prior to operation.</p>	<p>Construction ESMP.</p> <p>Operation ESMP.</p>	
1.4	<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 and meet on a monthly basis and maintain monthly meeting minutes as is required by Ministerial Decree 134/2003.</p> <p>In addition, the Project will appoint a suitably qualified Human Resources (HR)/ Labour Specialist that will oversee labour compliance of the Project, third party workers and in the supply chain. The Project will also appoint a Community Liaison Officer to implement the requirements of the Stakeholder. SLR recommends that Obelisk staff continue to be engaged on this project, where feasible, given their prior experience of a similar assignment.</p>	<p>HSE personnel.</p> <p>Labour Specialist personnel.</p> <p>Community liaison officer.</p>	ESR1, OS1, 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>	

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1.5	Contractually require the contractors to appoint sufficient E&S and HR staff to oversee the Project's E&S management at all times during construction in line with Egyptian E&S laws and regulations, and EBRD's PRs. Where feasible, ensure that Obelisk staff continues to be engaged on this project, given their prior experience of a similar assignment. Submit contractor organisational charts and CVs of key HSE/HR personnel to lenders for review prior to mobilisation.	HSE and labour personnel	ESR1, OS1, PS1 and legal requirement.	Company.	Prior to construction.	Contractor organisational chart and roles and responsibilities.	
1.6	Develop and implement a Contractor Management Plan that guides monitoring for ongoing compliance with E&S requirements. Conduct quarterly HSE and social compliance audits of all contractors and include results in monthly E&S reports to lenders	Enhanced E&S performance.	ESR1, OS1, PS1	Company.	Prior to construction. Prior to operation.	Contractor management plan	
1.7	Adopt Obelisk supply chain management system to the Project, enabling the Project to include E&S selection criteria and to include processes for taking action to issues identified, building on the Supply Chain Management of project Obelisk. Selection criteria 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, AfDB Operational Safeguard 2 (OS2) and the IFC Performance Standard 2 (PS2). With respect to solar and BESS supply chains, the management system will require: <ul style="list-style-type: none"> • Responsible Sourcing Policy • Supplier Code of Conduct • Mapping and risk assessment of solar module and solar component suppliers. • Define specific measures to be implemented in case the mapping reveals potential exposure to forced labour. • Inclusion of appropriate clauses in procurement notices and contracts with solar contractors and suppliers on labour risks and management thereof. • Self-declarations, legal representations/warranties or similar, by solar contractors, suppliers and sub-suppliers regarding labour risks. • 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 metal grade silicon where risks are identified). • When possible, requirements for solar 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, OS1, PS1, EU Guidance on Due Diligence for EU Businesses to Address the Risk of Forced Labour in Their Operations and Supply Chains	Company	Prior to procurement	Supply Chain policies and procedures covering all the listed requirements Evidence of implementation of supply chain management system (due diligence reports, risk assessment, contract clauses, labour audits reports, etc.)	
1.10	Project contractors will develop and implement their own ESMSs in line with the project ESMS and Project ESMS requirements. These ESMS will include the necessary resources, structures, policies, procedures, plans, monitoring and reporting requirements to deliver their responsibilities in line with the requirements of the project ESMS and project E&S commitments. The Contractors will ensure that the ESMS requirements extend to their staff and subcontractors through contracting provisions, awareness raising and monitoring. ESMS to be submitted for lender no-objection prior to construction and prior to operation	Enhanced E&S performance.	ESR1, OS1, PS1	Construction and operation contractors.	Prior to construction. Prior to operation.	EPC/O&M Contractor ESMS.	

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1.11	<p>Tender documentation for the contractor for the Project 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. Preparation of a project specific ESMS. Ensuring sufficient HSE and labour management personnel are present onsite. E&S and OHS reporting requirements. For all key suppliers (panel providers, BESS and inverter) ensure that the tier 1 supplier/s is not located in an area of systemic human rights abuse 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 	E&S risk management.	ESR1, OS1, PS1	Company.	Prior to initiating the tendering process.	Tender documentation including E&S requirements and approved by EBRD.	
1.12	Prepare environmental register and hazardous materials and waste register according to Law 4/1994 and Law 202/2020.	Legal compliance.	Legal requirement	Company.	From start of construction and updated continuously During operation.	Environmental register. Hazardous materials and waste register.	
1.13	<p>The Project will ensure that a Lenders' Environmental and Social Advisor (LESA) is contracted to undertake independent environmental and social 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, 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 Scatec if any.</p> <p>The Project will submit monthly reports documenting the E&S measures being implemented during the construction phase to the Lenders. In addition, an external annual performance audit report will be submitted to the Lenders starting the second year of the Project's implementation, compiled by the Company, summarising the annual E&S performance of the project.</p>	E&S reporting.	ESR1, OS1, PS1	Company.	<p>LESA E&S monitoring every quarter during construction</p> <p>LESA E&S monitoring bi-annually during first year of operation</p> <p>Monthly for E&S reports to lenders</p> <p>Annual for external E&S compliance audit report.</p>	E&S monitoring reports satisfactory to the EBRD.	

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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 Scatec's HR Policy in line with national law, the EBRD ESR2, the AfDB OS2 and the 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 or similar. Implementation will be supported by the relevant contractors. The HR Policy should at least cover the following:</p> <ul style="list-style-type: none"> • Approach to managing the Project workforce. • 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 and terms of employment. • Child labour and forced labour. • Equal opportunities and non-discrimination. • Prevention of and adequate response to Gender-Based Violence (GBV) and Sexual Exploitation, Assault and Harassment (SEAH). • Oversight provided of contractor policies/procedures. • Effective worker grievance mechanism. 	Labour risk management.	ESR2, OS2, PS2	Company.	<p>Prior to construction.</p> <p>Prior to operation.</p>	<p>Scatec Global HR policy</p> <p>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 (i) the nature and type of work, as well as job responsibilities, (ii) the wage and timing of payment, (iii) mandatory contributions such as medical, life, and social insurance, along with other agreed-upon benefits in both monetary and non-monetary forms, (iv) the duration of the contract, and (v) 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</p>	Labor risk management.	ESR2, OS2, PS2	Company and contractors.	<p>Prior to construction works commencing.</p> <p>Ongoing during construction and operation.</p>	Project employment contract.	
2.3	<p>Develop a labour management plan which ensures that all workers are engaged in accordance with Egypt's labor laws and regulations and international good practice. The labour management plan should 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. It should also ensure non-discrimination and equal opportunity, freedom of association, prohibition of child and forced labour, and the availability of a worker grievance mechanism. The plan should 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.</p> <p>It should prioritise the recruitment of local labour, in coordination with the labor office, and 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. Equal terms of employment and working conditions should be ensured for migrant workers and women, including equal pay for equal work and access to the same benefits and protections. The plan should build on lessons learned from the Obelisk project.</p>	Labour risk management.	ESR2, OS2, PS2	Company and contractors.	<p>Prior to construction.</p> <p>Prior to operation.</p>	Labour management plan.	

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2.4	<p>Assess accommodation requirements for the project using insights from the Obelisk project to determine the approximate number and categories of workers requiring accommodation. Based on this assessment, confirm whether existing Obelisk accommodation camps will be utilized for Dandara workers or whether separate, purpose-built accommodation will be developed.</p> <p>Develop an 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 requirements 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. The plan should explicitly prohibit the use of accommodation within nearby villages or, where unavoidable, establish strict controls to prevent adverse social impacts such as rent inflation or pressure on local services. The inspection program 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, OS2, PS2	Company and contractors.	Two months prior to construction.	Accommodation Management Procedure and Contractors' Accommodation Management Plan	
2.5	<p>Develop and implement a formal internal grievance mechanism for the Project as per EBRD's ESR2, AfDB OS2, 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.</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> <p>The mechanism should build on lessons learned from the Obelisk project.</p>	Grievance management.	ESR2, OS2, 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>	
2.6	<p>Develop a security management plan in line with EBRD ESR2, AfDB OS2 and IFC PS2. 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> <p>The plan should build on lessons learned from the Obelisk project.</p>	Security risk management.	ESR2, OS2, PS2	Company and contractors.	<p>Prior to construction.</p> <p>Prior to operation.</p>	Security management plan.	

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ESR 3, OS 3, PS 3: Resource Efficiency and Pollution Prevention and Control							
3.1	<p>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.</p> <p>The plans should build on lessons learned from the Obelisk project.</p>	Air and noise quality management.	ESR3, OS3, PS3	Company and construction contractor.	Prior to construction.	Air quality and noise management plan.	
3.2	<p>Prefer non-potable sources where possible. Monitor during construction and operation.</p> <p>For solar panel cleaning, a waterless solution must be preferred. 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>	Risk of overuse of local water. Benefit: protect water resources, avoid conflicts.	ESR3, OS3, PS3	Company and construction contractor.	If required, Water balance before construction, monitor annually	If required, Water balance approved; Evidence of reduced potable water use.	

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3.3	<p>Develop and implement a Waste Management Plan and Wastewater Management Plan meeting the requirements of Egyptian laws and regulations and the EBRD ESR3, AfDB OS3 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 EU 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 Scatec'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 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.</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> <p>The plans should build on lessons learned from the Obelisk project.</p>	Waste management.	ESR3, OS3, 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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3.4	<p>Establish a hazardous materials storage warehouse in line with Egyptian laws and regulations and the EBRD ESR3, AfDB OS3 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, OS3, 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>	
3.5	Ban the use of herbicides or pesticides during the construction and operation, in particular for vegetation control	Pollution control	ESR3, OS3, PS3	Company and Contractors	during construction and operation	No use of pesticides / herbicides. Ban included in EPC and O&M contracts	

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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 develop an Occupational Health and Safety Management Plan (OHSMP) during the construction and operation phases, addressing key impacts such as electrocution, working at height, lifting, etc. and including a commitment to implementing a permit to work system, conducting OHS risk assessments. The plan should build on lessons learned from the Obelisk project.	Worker health and safety.	ESR4, OS2, OS4, 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 as well. 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, OS2, OS4, 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, labor standards, grievance handling, and pressure on local services, and assign clear roles and responsibilities, monitoring requirements, and reporting mechanisms to ensure effective implementation and compliance. The plan should build on lessons learned from the Obelisk project.	Community health and safety.	ESR4, OS2, OS4, PS2 and legal requirement	Company and contractors.	Prior to construction.	Worker Influx Management Plan.	
4.4	Develop and implement a comprehensive Traffic and Road Safety Management Plan in compliance with Egyptian Traffic Rules and Regulations for the transport of Project materials and workers. This plan should include a systematic vehicle inspection and maintenance program, establishment of transportation-related KPIs, a tracking system for traffic violations to identify areas for improvement, and a journey management plan that covers all aspects of road transport safety in addition to a training and capacity validation program. The plan should build on lessons learned from the Obelisk project.	Community health and safety.	ESR4, OS2, OS4, PS2 and legal requirement	Company and contractors.	Prior to construction Prior to operation.	Traffic and road safety management plan.	

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4.5	<p>Develop an 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 define training requirements for specialized emergency response teams, maintain a list of onsite and offsite key emergency contacts. It should provide clear guidelines for coordination with government authorities, including emergency services. The plan should 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. Evacuation routes and designated assembly points should be clearly marked on evacuation maps. The plan should 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. Finally, the plan should 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.</p> <p>The plan should build on lessons learned from the Obelisk project.</p>	Emergency response.	ESR4, OS2, OS4, PS2 and legal requirement	Company and contractors.	Prior to construction. Prior to operation.	Emergency preparedness and response plan.	
4.6	<p>Construction activities during summer should be avoided to the extent possible, and a specific work schedule should be agreed during the hottest periods.</p> <p>Construction Contractor to monitor heat-related incidents and ensure that workers in the warm season are provided with shaded places to rest/eat, appropriate duration of breaks and with sufficient cold drinking water.</p>	Worker Health and Safety	ESR4, OS2, OS4, PS2	Company and contractors.	During construction	Measures in place, incidents reported to lenders	
4.7	<p>Minimize the risk of serious consequences from snake bite or scorpion sting:</p> <ul style="list-style-type: none"> Train workers regarding snake/scorpion risks, preventive measures when working on the field, behaviour in case of snake/scorpion encounter, behaviour if victim or witness of a snake bite / scorpion sting (at induction during construction, annually during operation). Allow access to the site only to personnel / workers with ankle-high shoes or boots. Do not allow personnel / workers working alone inside the PV land plot. Regularly check availability of antivenom on site, or the closest medical centres with available antivenom. Make their contact and address readily accessible at the PV plant office. Annually check with a specialized doctor the above-listed snake bite / scorpion sting management procedures, and improve them if needed. 	Worker Health and Safety	ESR4, OS2, OS4, PS2	Company and contractors.	During construction	Measures in place, incidents reported to lenders	

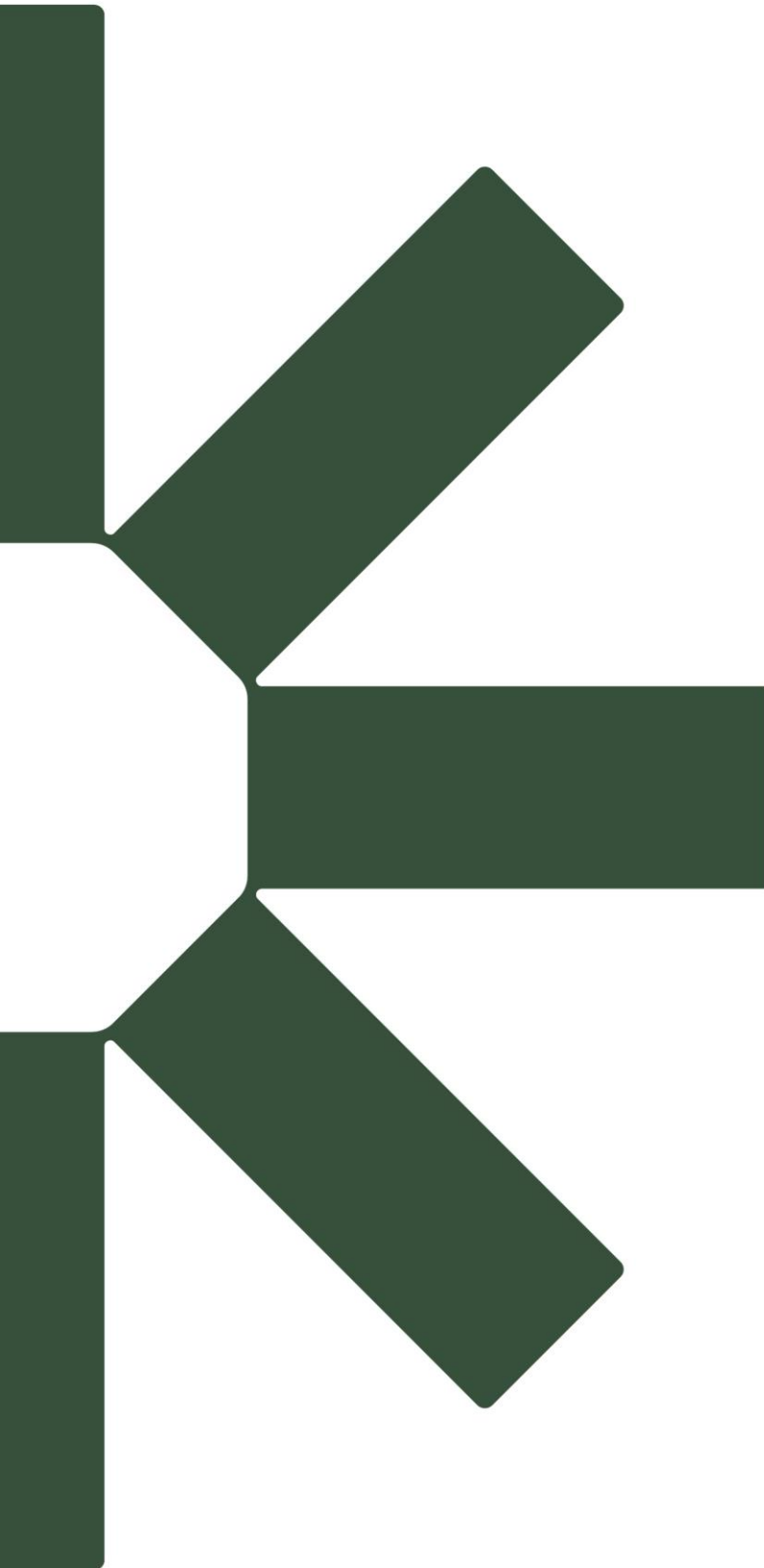
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ESAP#	ACTION	ENVIRONMENTAL & SOCIAL RISKS (LIABILITY/BENEFITS)	REQUIREMENT (LEGISLATIVE, EBRD ESR, BEST PRACTICE)	RESPONSIBILITY	TIMETABLE	TARGET AND EVALUATION CRITERIA FOR SUCCESSFUL IMPLEMENTATION	STATUS
ESR 6, OS 6, PS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES							
6.1	<p>The relevant ESMS section/ document to include i) additional mitigation measures devised in the ESIA addressing potential risks of bird collision and electrocution from overhead transmission lines and ensuring the ESMP includes measures meeting the requirements of IFC's Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution, where relevant, practical and feasible; and ii) an Alien Plant Management Plan.</p> <p>Among others, install bird flight diverters on the OHTL and ensure proper insulation of the connections. Apply electrocution prevention measures; conduct 12-month post-construction fatality monitoring; clarify EETC responsibilities and require evidence of implementation.</p> <p>The requirements should build on lessons learned from the Obelisk project.</p>	Biodiversity Risk Management.	ESR6, OS6, PS6	Company and contractors	Prior to start of construction	Updated ESMP.	
6.2	Develop a Biodiversity Management Plan (BMP) to train and inform workers on actions in case they encounter PBFs. The BMP would provide a strategy for implementing the mitigation hierarchy in such a way that no net loss can be achieved. Include pre-construction ecological walkover.	Biodiversity Risk Management	ESR6, OS6, PS6	Company and biodiversity contractors	Within one month of official Project disclosure and prior to commencing and/or advancing construction of the solar and BESS	Biodiversity Management Plan submitted for lender approval	

ESAP#	ACTION	ENVIRONMENTAL & SOCIAL RISKS (LIABILITY/BENEFITS)	REQUIREMENT (LEGISLATIVE, EBRD ESR, BEST PRACTICE)	RESPONSIBILITY	TIMETABLE	TARGET AND EVALUATION CRITERIA FOR SUCCESSFUL IMPLEMENTATION	STATUS
ESR 8, OS 8, PS 8: CULTURAL HERITAGE							
8.1	Develop a chance find procedures as part of the site construction management plan to address the unexpected discovery of cultural heritage 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. 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 excavations.	Managing potential chance finds.	ESR8, OS8, PS8	Company and construction contractors.	<p>Procedure in place prior to earth works.</p> <p>Procedure implemented during earth works.</p>	Chance Find procedure in place and implemented.	

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ESAP#	ACTION	ENVIRONMENTAL & SOCIAL RISKS (LIABILITY/BENEFITS)	REQUIREMENT (LEGISLATIVE, EBRD ESR, BEST PRACTICE)	RESOURCES, INVESTMENT NEEDS, RESPONSIBILITY	TIMETABLE	TARGET AND EVALUATION CRITERIA FOR SUCCESSFUL IMPLEMENTATION	STATUS
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. Update SEP to include Phase 2 ESIA disclosure process and timeline. The plan should build on lessons learned from the Obelisk project.	Stakeholder engagement and information disclosure.	ESR10, OS10, 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 GBV and SEAH related grievances linked to the Project as defined in the Project SEP. Keep a log of the complaints and track resolution process.	External grievance mechanism.	ESR10, OS10, 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. The plan should build on lessons learned from the Obelisk project.	Corporate social responsibility.	Best Practice	Company	Prior to operation	CSR plan	



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