

ESAP#	ACTION	ENVIRONMENTAL & SOCIAL RISKS (LIABILITY/BENEFITS)	REQUIREMENT (LEGISLATIVE, EBRD ESR, BEST PRACTICE)	RESPONSIBILITY	TIMETABLE	TARGET AND EVALUATION CRITERIA FOR SUCCESSFUL IMPLEMENTATION	STATUS
<b>ESR 1, ESS 1, PS 1: Assessment and Management of Environmental and Social Impacts and Issues</b>							
1.1	<p>Project Owner will ensure that an ESIA is completed for the Overhead Transmission Lines (OHTL) that meets EBRD's ESRs and IFC PSSs, national and local requirements, as well as good international practice for the sector (e.g., for electrical transmission). The ESIA including supporting documentation will be undertaken by suitability skilled and experienced E&amp;S specialists. The ESIA will include an assessment of flood risks, considering climate change, and present mitigation measures to be included in the design.</p> <p>The ESIA will be subject to independent review by the LESA to determine its alignment with lender E&amp;S standards and the appropriate assessment and mitigation of risks and impacts. The ESIA will include a formalised, participatory disclosure by EETC and consultation process in line with lender standards and regulatory requirements.</p> <p>Project will follow up as needed on Project permit obtention from the Egyptian Environmental Affairs Agency (EEAA).</p>	E&S risk management, legal compliance and compliance with Lender requirements.	Permit requirement, PS1, ESR1 & ESS1.	Project Owner.	Prior to construction of the OHL.	ESIA for OHTL completed according to lender standards.	
1.2	<p>Develop a permit register clearly outlining the required permits for the construction and operation phases of the Project also in line with applicable Contractual requirements. The register must include information on the permitting authority, permitting process, and any potential challenges in acquiring these permits. The register must include the status of the Project's compliance with the conditions in the environmental permit.</p> <p>In addition to the environmental permit, some other potentially relevant permits include the following:</p> <ul style="list-style-type: none"> <li>• Land use permit;</li> <li>• Licence of Excavation (including disposal of construction waste);</li> <li>• Construction Permit;</li> <li>• Environmental batching plant permit;</li> <li>• Licence for the handling and storage of hazardous waste;</li> <li>• Approval for emergency response and firefighting plans;</li> <li>• Primary Site Access Route equipment transportation permit and heavy equipment transportation permit;</li> <li>• Construction and Operation Permit for Private Investors – Temporary Permit - to allow construction of project; and</li> <li>• Construction and Operation Permit for Private Investors – Permanent Generation Licence – to carry out production, distribution or sale of electricity.</li> </ul>		Permitting requirements.	Project Owner.	Prior to construction. Prior to Operation.	Permit register.	

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1.3	<p>Develop and implement a Project- and site-specific ESMS based on Alcazar Energy's ESMS Framework, and considering the requirements of the ESMP, ESAP, local regulations and the Reference Framework, inter alia:</p> <p>Project Owner:</p> <ul style="list-style-type: none"> <li>Health, Safety, Environment and Social (HSES) Manual that should include: (i) HSE Policy; (ii) Human Resources (HR) Policy and Procedures; (iii) HSE Organisational Structure and Responsibilities; and (iv) HSE Training, Monitoring and Reporting.</li> <li>E&amp;S audit and monitoring programme.</li> <li>Stakeholder Engagement Plan (SEP).</li> <li>Community Grievance Mechanism.</li> <li>The HSES Manual will cover the necessary aspects to enable early works activities for the campsite and the main access road. Active Turbine Management Plan (ATMP) (prior to commissioning).</li> </ul> <p>Project Contractor(s):</p> <ul style="list-style-type: none"> <li>Water Management Plan.</li> <li>Waste and Wastewater Management Plan.</li> <li>Soil and Groundwater Management Plan.</li> <li>Air Quality and Noise Management Plan.</li> <li>Traffic and Transport Management Plan.</li> <li>Community H&amp;S and Worker Influx Plan.</li> <li>Occupational Health and Safety Plan.</li> <li>Emergency Preparedness and Response Plan.</li> <li>Hazardous Material Management Plan.</li> <li>Biodiversity Management Plan (BMP).</li> <li>Security Management Plan.</li> <li>Archaeological and Cultural Heritage Chance Find Procedures (CFP).</li> <li>Worker Grievance Mechanism.</li> <li>HR Management Plan.</li> <li>Employment and Procurement Management Plan.</li> <li>Worker Accommodation Plan.</li> </ul> <p>Project Operator:</p> <ul style="list-style-type: none"> <li>Water Management Plan.</li> <li>Waste and Wastewater Management Plan.</li> <li>Occupational Health and Safety Plan.</li> <li>Emergency Preparedness and Response Plan.</li> <li>Security Management Plan.</li> <li>Hazardous Material Management Plan.</li> <li>BMP.</li> <li>Employment and Procurement Management Plan.</li> <li>.</li> </ul> <p>Review all ESMS documentation and management plans to be adopted by the Contractor(s) and Project Operator to ensure compliance against Egyptian E&amp;S laws and regulations and the Reference Framework.</p>	Improved E&S performance, legal compliance and compliance with Lender requirements.	Permit requirement, PS1, ESR1 & ESS1.	Project Owner, Contractor(s) and Project Operator, respectively	Project Owner: Prior to financial close and prior to early works (campsite and main access road). Construction Contractor (s). Prior commissioning for ATMP Construction Contractor(s): Prior to mobilisation. Project Operator: Prior to operation.	ESMS in place and approved by Lenders and the Project Owner.	
1.4	Define the roles and responsibilities of each entity involved in the Project and their staff in relation to implementation of the ESMS and develop an organisational structure that identifies the lines of authority. This should be clearly defined in onshore and offshore procurement agreements with the contractor(s) and similarly cascaded to subcontractors.	Improved E&S performance and compliance with Lender requirements.	PS1, ESR1 & ESS1.	Project Owner	Prior to mobilisation of contractor(s).	Project ESMS organogram, inclusive of HSE, HR and CLO roles.	
1.5	Appoint suitably qualified HSE Manager and CLO to implement mitigation and monitoring requirements applicable to the Project Owner in the ESMS and to ensure overall compliance of the Contractor(s) and Project Operator with the requirements of the ESMS.	Improved E&S performance, legal compliance and compliance with Lender requirements.	Local legislation, PS1, ESR1 & ESS1.	Project Owner.	Prior to mobilisation.	Project-appointed HSE Manager. Project-appointed CLO.	
1.6	Contractually require the contractor(s) to appoint sufficient E&S and HR staff during construction in line with Egyptian E&S laws and regulations and the Reference Framework. It is recommended as best practice to include an ecologist/biodiversity specialist to oversee the Project's E&S management. Ecologist/biodiversity specialist can be hired through the Project Owner or Contractor.	Improved E&S performance, legal compliance and compliance with Lender requirements.	Local legislation, PS1, ESR1 & ESS1.	Project Owner.	During contract negotiations with contractor(s).	Contractor-appointed HSE, HR personnel.	

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1.7	Contractually require the Project Operator to duly assign HSE responsibilities and resources at corporate and site-based level and implement the mitigation and monitoring requirements as specified for the Project Operator in the ESMS.	Improved E&S performance, legal compliance and compliance with Lender requirements.	Local legislation, PS1, ESR1 & ESS1.	Project Owner.	Prior to mobilisation of the Project Operator.	Project Operator to appoint competent personnel onsite with responsibility of HSE and HR.	
1.8	Establish an HSE Department (meeting Egyptian OHS to worker ratio requirements (two specialists and three technicians for a workforce between 500 and 1,000) as a minimum) and an occupational health and safety committee to comply with the provisions of Ministerial Decree 134/2003 when the workforce reaches 50 employees or more. The OHS Committee should receive basic OHS training and meet monthly and maintain monthly meeting minutes as is required by Ministerial Decree 134/2003.	HSE personnel competence and legal compliance.	Local legislation.	Contractor(s). Project Operator.	During construction and operational (if applicable) phases.	HSE Committees, HSE Committee meeting notes. HSE training material and records.	
1.9	Develop and maintain an HSE Training matrix for onsite training per employee, with the following training as a minimum: <ul style="list-style-type: none"> <li>Basic visitor HSE induction training.</li> <li>Worker HSE induction training for all workers (including topics on PPE, waste management, etc.)..</li> <li>Emergency response training for all workers.</li> <li>Biodiversity management.</li> <li>Labor management (covering topics such as code of conduct, terms of employment, working conditions, grievance mechanism)</li> <li>Specialised training (e.g., Global Wind Organization training).</li> <li>Toolbox talks communicating HSE hazards associated with specific activities but also on labor related topics.</li> </ul>	HSE personnel competence, improved E&S performance and compliance with Lender requirements.	PS1, ESR1 & ESS1.	Contractor(s). Project Operator.	During construction and operational phases.	HSE Training Plans for construction and operational phases. HSE training material and records.	
1.10	Ensure the tendering process for the appointment of Contractor(s) and Project Operator for the Project considers demonstratable past performance in relation to E&S management on similar projects. As part of current procurement process on tendering, the Project will undertake a risk assessment of the Contractors to identify the risk of any potential human rights risks and issues.  Monitoring for ongoing compliance with E&S requirements. will be part of the several management plans.	HSE personnel competence, improved E&S performance and E&S risk management.	Best practice	Project Owner.	Prior to appointment of Contractor(s).	Contractor tender evaluation documentation showing consideration of past E&S performance.	
1.11	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 semi-annually during the first year of operation and annually the subsequent year. 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 the Reference Framework, the implementation of the ESAP and the compliance of the Project Owner with the E&S covenants in the financing agreement.	E&S risk management and compliance with Lender requirements.	PS1, ESR1 & ESS1	Project Owner with consultant support.	During construction and operational phases.	LESA monitoring reports.	
1.13	Prepare environmental register and hazardous materials and waste register according to Law 4/1994.  Submit bi-annual Occupational Health and Safety (OHS) statistics to the labour office during the Project's construction and operational phases to comply with the requirements of Ministerial Decree 126/2003.	Legal compliance.	Local legislation.	Project Owner and Contractor(s)	During construction and operational phases.	Environmental register. Hazardous materials and waste register.  OHS statistics submission to Labour Office.	

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<b>ESR 2, ESS8, PS 2: Labour and Working Conditions</b>							

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2.1	<p>Implement Human Resources Policy and Procedures, which will apply to all project contractors in line with EBRD ESR2 and IFCPS2. Human resources policy and associated procedures and plans should include a Local Recruitment Management Plan and training strategy or similar. Implementation will be supported by the relevant contractors. The HR Policy should cover the following:</p> <ul style="list-style-type: none"> <li>• Approach to managing the Project workforce, including third-party and supply chain.</li> <li>• Local recruitment procedure ensuring that priority job opportunities are targeted for local community members to the greatest extent possible throughout the construction and operation phase for skilled and unskilled jobs.</li> <li>• Human rights.</li> <li>• Working conditions and terms of employment.</li> <li>• Child labour and forced labour.</li> <li>• Equal opportunities and non-discrimination.</li> <li>• Prevention of and adequate response to Gender-based Violence and Harassment (GBVH).</li> <li>• Oversight provided of contractor policies/procedures.</li> <li>• Effective worker grievance mechanism.</li> </ul>	Improved E&S performance, legal compliance and compliance with Lender requirements.	Local legislation, PS2, ESR2, ESS8 & ESS9	Contractor(s), and Project Operator	Prior to mobilisation	HR Policy and procedures are in place and approved by Lenders and the Project Owner.	
2.2	<p>Ensure that every worker (including casual labour) engaged in the Project will receive a contract in accordance with national law and aligned with EBRD ESR2/IFC PS2.</p> <p>The project should develop a Labour Management Plan (LMP) in line with legal and lender requirements that ensures all workers are engaged per Egypt's labour laws and regulations. The LMP will include details around working conditions for the workforce, including access to welfare and sanitation facilities, LMP will prioritize the recruitment of local labour and commit to ensuring that wages comply with Egypt's minimum wage regulations and are fair, considering qualifications, competencies, professional experiences, assigned roles and responsibilities, wages for similar positions, and other relevant factors. Migrant workers and women will receive equal terms of employment and working conditions.</p> <p>The Project will need to include and enforce sufficient measures in the Contractor's agreement to ensure that the workers' accommodation conforms with IFC PS2, EBRD ESR2, and the joint guidance note on Workers Accommodation: processes and standards, as well as Alcazar's Labour Accommodation Strategy Plan for construction. The Project will ensure the accommodation plan will be implemented by contractors providing their workforce with accommodation. The Project will develop a Worker's Accommodation Plan, outlining requirements and an accommodation inspection program aligned to these standards for accommodation facilities provided to blue- and white-collar workers</p> <p>The Project should establish strict controls for selection of accommodation to prevent adverse social impacts such as rent inflation or pressure on local services, GBVH or others, in line with the assessment already in the ESIA.</p>	E&S risk management, Legal compliance and compliance with Lender Requirements.	Local legislation, PS2, ESR2, ESS8 & ESS9	Contractor(s), Project Operator	Prior to mobilisation	Labour management, worker's accommodation plan, and accommodation inspection program is in place and approved by the Lenders and Project Owner.	
2.3	The Project Owners must develop and implement a formal internal worker grievance mechanism for the Project in accordance with EBRD's ESR2, ESS8 & ESS9, and IFC PS2. This mechanism must ensure access for all Project workers, including those employed or engaged by contractors and subcontractors. The mechanism should include specific measures to accommodate GBVH complaints in a sensitive and safe way with a survivor centered approach.	E&S risk management, Legal compliance and compliance with Lender Requirements	PS2, ESR2, ESS8 & ESS9	Project Owner	Prior to mobilisation	A grievance mechanism in place and accessible	
2.4							

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<b>ESR 3, ESS3, PS 3: Resource Efficiency and Pollution Prevention and Control</b>							
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.	PS3, ESR3, ESS3	Contractor(s).	Prior to mobilisation.	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, ESS3 and IFC PS3.</p> <p>The Waste Management Plan should cover:</p> <ul style="list-style-type: none"> <li>approved waste disposal facilities for the Project that are licensed entities, and for which selection has been based on a high level assessment of the disposal facility's performance</li> <li>requirements for regular visits and reviews to verify their proper management and suitability for waste disposal.</li> <li>the segregation, storage, handling, recycling, and safe disposal of hazardous waste (HW) and non-hazardous waste (NHW) in line with applicable requirements.</li> <li>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.</li> </ul> <p>The Wastewater Management Plan should include measures to:</p> <ul style="list-style-type: none"> <li>prevent contamination of soil and groundwater,</li> <li>ensure proper collection and discharge of effluents (including those generated by concrete trucks), and define monitoring and emergency response procedures.</li> </ul>	Waste management.	PS3, ESR3, ESS3	Company and contractors.	Plan in place prior to mobilisation. Implemented during construction and operation.	Waste and Wastewater Management Plan.	

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3.3	<p>Prior to commencement of any waste upliftment or excavation activities, all personnel involved in waste handling, excavation, and construction within the legacy landfill area should receive appropriate training. This training should include environmental awareness, identification of potentially hazardous materials (including asbestos-containing materials), safe waste handling procedures, use of personal protective equipment (PPE), dust and exposure mitigation measures, and emergency response procedures. Training should be delivered by a suitably qualified environmental or occupational health specialist and documented prior to site mobilisation.</p> <p>Prior to construction of the B68 turbine, a targeted excavation programme should be undertaken to remove legacy landfill waste and contaminated soils from the development footprint and surrounding working areas. Municipal waste should be excavated systematically, handled only by trained personnel, and disposed of at a licensed facility in accordance with national regulations and international best practice.</p> <p>In the event of suspected hazardous materials found present (e.g., asbestos, hydrocarbons, heavy metals), all site personnel involved in excavation, material handling, or construction activities should be equipped with appropriate personal protective equipment (PPE). This should include as necessary: respiratory protection suitable for asbestos-containing dust, disposable coveralls, gloves, and eye protection. PPE requirements should be defined by a suitably qualified environmental or occupational specialist prior to commencement of works.</p> <p>Excavation and handling activities should be scheduled and managed to minimise dust generation, wind-blown debris, and surface runoff into surrounding soils. Control measures may include dust suppression, covering of stockpiles with weighted sheeting, designated waste laydown areas on bunded surfaces, and temporary fencing or barriers to prevent material migration.</p> <p>Following removal of waste material, if any visibly contaminated soils, confirmatory soil sampling should be undertaken to determine any necessary remedial activities and to confirm that residual contaminant concentrations meet relevant risk-based criteria. Sampling should be completed by a qualified environmental professional and analysed at an accredited laboratory.</p> <p>In the event that buried waste or contaminated soils remain in areas that cannot be excavated, a risk-based approach should be adopted to determine whether engineered controls (e.g., capping layers or clean fill cover) are required to mitigate potential exposure pathways during operation of the wind turbine.</p> <p>Soil handling records, waste volumes, laboratory results, and any remedial design decisions should be documented and retained by the project's health, safety, security and environment (HSSE) department for future reference and regulatory review.</p>	Waste management.	PS3, ESR3, ESS3	Company and contractors.	Plan in place prior to mobilisation. Implemented during construction	Waste upliftment supporting documents and photos	

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3.4	<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"> <li>Controls to limit access of unauthorized persons.</li> <li>Impermeable flooring and appropriate drainage and sump pits to collect any spilled liquids.</li> <li>Use of spill containment pallets or other appropriate secondary containment methods.</li> <li>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.</li> <li>Display handling instructions and safety signage.</li> <li>Install emergency response equipment, such as fire fighting extinguishers (type depending on material stored), absorbents and other spill.</li> </ul> <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.	PS3, ESR3, ESS3 and legal requirement	Company and contractors.	During construction and operation.	Hazardous Materials Management Plan. Permanently established hazardous material storage area meeting Egyptian regulatory requirements and international good practice.	
3.5	<p>Develop and implement a Water Management Plan aligned to EBRD ESR3 and IFC PS3, 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>Groundwater abstraction or sourcing water from existing licensed groundwater suppliers in the Project area for sanitary and/or construction purposes is prohibited unless an assessment has been completed by a qualified independent third party confirming suitability and sustainability of such use. Coordinate with the Ras Ghareb Water Company, or any other licensed suitable Water Company, to secure the water requirements of the Project.</p>	Pollution control	PS3, ESR3, ESS3	Company and Contractors	Prior to and during mobilization	Water Management Plan. Agreement on water supply.	
3.6	The Project will be required to provide an assessment of avoided GHG emissions (in tonnes of CO <sub>2</sub> e) to meet the requirements of at least EBRD's Environmental and Social Policy (2024).	GHG emission reporting	PS3, ESR3, ESS3	Project Owner	Annually during operations	GHG emissions avoided quantified	



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<b>ESR 4, ESS4, PS 2: HEALTH, SAFETY AND SECURITY</b>							
4.1	The Contractor(s) and Project Operator are to develop and implement OHS Management Plans during the construction and operational phases to address key Occupational Health and Safety (OHS) risks of activities, such as electrocution, working at height, lifting, etc. These plans must include commitments to conduct OHS risk assessments and to implement a permit to work system.	Improved E&S performance, E&S risk management and compliance with Lenders Requirements	Local legislation, PS2, ESR4, ESS8 & ESS9	Contractor(s), and Project Operator.	Prior to mobilisation	OHS Management system	
4.2	Establish a clinic on-site with the presence of a nurse and physician throughout the construction phase. 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, stretchers, backboards, immobilisation equipment, a sphygmomanometer, an oxygen tank, a refrigerator, and any other necessary medical equipment. Additionally, the clinic should be stocked with antivenom to address snake and scorpion bites.	E&S risk management, legal compliance and compliance with lender requirements.	PS2, ESR2, ESS8 & ESS9	Contractor(s)	Prior to construction.	Suitably equipped and resourced site clinic in place and approved by the lenders.	
4.3	a) If construction activities require a significant influx of works which may result in community and other impacts, develop and implement a Workers' Influx Management Plan. b) If construction works overlap with other major construction projects in the area, the Project will conduct an assessment of potential cumulative impacts of worker influx to the area, based on publicly available information, and implement mitigation measures if necessary.	Community health and safety.	PS2, ESR4, ESS9	Company and contractors.	a) Prior to start of mobilisation b) Conditional - within three months of other construction projects beginning in the area	Worker Influx Management Plan.	
4.4	Contractor to 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 Key Performance Indicators (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. Provide regular Defensive Driving Training for all drivers, maintain records of training, attendance, vehicle maintenance, and ensure that all measures are documented and accessible for review and auditing purposes.	Worker health and safety. Community health and safety.	PS2, ESR4, ESS9 and legal requirement	Company and contractors.	Prior to mobilisation Prior to operation.	Traffic and road safety management plan.	
4.5	Develop a Project-specific Emergency Preparedness and Response Plan (EPRP) aligned to EBRD ESR4 and IFC PS4 that identifies potential emergency scenarios, including flooding, extreme heat, and earthquakes, and assesses their associated risks to establish tailored response procedures for each.	Emergency response.	PS2, ESR4, and legal requirement	Company and contractors.	Prior to mobilisation Prior to operation.	Emergency preparedness and response plan.	



4.6	<p>The Project Owner must prepare a Security Risk Assessment and the Contractors and Operator a Security Management Plan to be implemented during the construction and operation phases of the Project. The plan should be based on the Security Risk Assessment and must identify appropriate measures for hiring, rules of conduct, training, equipping, and monitoring of security personnel to control and manage security issues. The plan must ensure that security personnel are guided by the Voluntary Principles on Security and Human Rights in terms of hiring, rules of conduct, training, equipping, and monitoring. This includes:</p> <ul style="list-style-type: none"><li>• Conducting reasonable inquiries to ensure those providing security measures are not implicated in past abuses.</li><li>• Ensuring security personnel are adequately trained in the use of force (and firearms if applicable) and appropriate conduct towards workers and the local community.</li><li>• Using force only when strictly necessary and to an extent proportional to the threat.</li></ul>	Security risk management.	PS4, ESR2, ESS8 & ESS9	Project Owner, Contractor(s), and Project Operator	Prior to construction	Security Management Plan in place and approved by the Lenders	
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<b>ESR 6, ESS4, PS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>							
6.1	<p>Implement mitigation actions included in the project Environmental and Social Impact Assessments (ESIA) to reduce the significance of habitat loss, fragmentation, and degradation during the construction phase.</p> <ul style="list-style-type: none"> <li>All site workers will undertake an induction before working on site including a comprehensive biodiversity element where the baseline ecological value and sensitivity of the site will be discussed. All hunting, gathering, poaching and disturbances of fauna and flora will be prohibited</li> <li>Prior to construction working areas will be clearly demarked so that the workers fully understand the working area.</li> <li>On completion of phased construction works the Contractor will be responsible for habitat rehabilitation works in all areas that have been subject to temporary disturbance</li> <li>The BAP and BMP will detail the procedures to ensure no net loss of Priority Biodiversity Features and net gain of Critical Habitat if relevant as a result of construction works.</li> </ul>	Biodiversity Risk Management	PS6, ESR6, ESS4	Company and contractors	<p>Induction and fencing of campsite under early works prior to mobilisation.</p> <p>Updated BAP and BMP before board approval.</p>	<p>Management plans and procedures in place and implemented and acceptable by the lenders.</p> <p>Biodiversity reporting to the lenders and data available.</p>	
6.2	<p>Mitigation actions included in the ESIA to mitigate potential vehicle collisions must be implemented.</p> <ul style="list-style-type: none"> <li>Speed limits of 20 kph are to be enforced by the EPC contractor</li> <li>Regular signage will be installed along the site access roads and internal roads to inform of speed limits</li> <li>Driving at night should be confined to essential staff only and off-road driving should be banned at all times</li> </ul>	Biodiversity Risk Management	PS6, ESR6, ESS4	Company	At all time during construction and operation	<p>Management plans and procedures in place and implemented and acceptable by the lenders.</p> <p>Biodiversity reporting to the lenders and data available.</p>	
6.3	<p>Ensure that pre-construction biodiversity surveys are undertaken prior to the start of early works of the WPP and OHTL to ensure that impacts to terrestrial biodiversity, including the Egyptian Spiny-tailed Lizard are avoided. A specialized ecologist will be hired to conduct the surveys prior to early works for the campsite and main access road and develop the Spiny-tailed lizard related actions. Implementation of species/habitat protection measures during construction will be supervised by EEAA's Environmental Protection Sector.</p> <p>Detailed design for the WPP layout will take into account the results of the specialist surveys directed at the Egyptian Spiny-tailed Lizard during the ESIA phase, and WPP infrastructure will be sited to avoid the identified burrows.</p> <p>Where this is not possible, or where fresh burrows are found at the start of clearance works, these burrows will be excavated by hand, and the animals captured and translocated following the procedure detailed in the ESIA. This procedure also applies to the OHTLs if required by the corresponding ESIA.</p> <p>Prior to early works in an area containing Egyptian Spiny-tailed Lizard burrows, any remaining burrows within 50 m of proposed works will be re-checked using an endoscope. If empty, the burrow will be destroyed. If any animal is found, the burrow will be dug carefully by hand and the animal captured and placed in a secure box before taking to a cool location ready for translocation to the receptor site. If areas suitable for translocation exist within the project area, these will be prioritized. A monitoring program of translocated populations should be established immediately after relocation. This will ensure that the long-term viability of the translocated populations is tracked and will contribute to the determination of "no net loss" of biodiversity outcome.</p>	Biodiversity Risk Management	PS6, ESR6, ESS4	Company and biodiversity contractors	Prior to construction for the design and prior early works of the corresponding of the wind power plant and the associated facilities respectively for implementation of the measures.	Biodiversity reporting to the lenders and data available.	
6.4	<p>E This procedure also applies to the OHTLs if required by the corresponding ESIA.</p> <p>Pre-construction surveys will also target birds that are potentially breeding in the area, aiming to find nests that could be at risk from construction related impacts. Surveys will be conducted by an appropriately qualified ecologist following the methods detailed in the ESIA. Where nests are found they will be recorded, and their locations mapped. Depending on the species and its conservation status, works exclusion zones will be defined and agreed with the qualified project ecologist.</p>	Biodiversity impact management	PS6, ESR6, ESS4	Company and biodiversity contractors	Surveys prior to early works and mitigation actions during construction	Surveys undertaken. Biodiversity reporting to the lenders and data available.	

6.5	<p>The following actions, listed in the ESIA's will be implemented during the project operation phase:</p> <ul style="list-style-type: none"> <li>• Migratory Soaring Bird monitoring during Spring (late February to mid-May) and Autumn (mid-August to mid-November). During these periods, monitoring must take place continuously on a daily basis with full site coverage using vantage points and experienced surveyors.</li> <li>• Shutdown on demand following the ATMP protocol (a detailed plan must be concluded in collaboration with RCREEE, including shutdown criteria, applicable period during spring and autumn migration, team requirements ensuring a biodiversity specialist is in charge of shutdowns radar use and protocols as described in the PPA, shutdown protocol, communications protocol)</li> <li>• Fatality monitoring (wind turbines and Project associated OHTL), including number, location and suspected cause of death of bird fatalities, bias correction trials and calculating fatality rates, following Good International Industry Practice</li> <li>• Monitoring of the OHTL BFDs every six months prior to the spring and autumn migration seasons. Procurement of the damaged or defective units before the start of the season.</li> <li>• Adaptive management taking into consideration the fatality thresholds presented in the Cumulative Effects Assessment (based on Population Biological Removal model) must be implemented. If fatality thresholds are exceeded by either the wind turbines or the transmission lines, offsets must be considered in order to achieve No Net Loss and Net gain for priority species and critical habitat species respectively (described in BAP – note that net gain is required for critical habitat species in the IBA even if thresholds are not exceeded).</li> <li>• Adaptive management to take consideration of recommendation of the SCISA for the Red Sea and potential thresholds established. This should be done in a commensurate manner considering the study is not available at the time of commitment by the Project in this ESAP and as such should be reasonable and proportionate to the biodiversity risks, impacts, and management measures committed to by the Project</li> </ul>	Migratory soaring bird collision risk management	PS6, ESR6, ESS4	Company and contractors	Six months prior to start of operations and implemented throughout the life of the project.	Operations phase BMP, acceptable to lenders, in place and implemented. Biodiversity reporting to the lenders and data available.	
6.6	<p>Ensure the implementation of shutdown on demand during spring and autumn migratory periods according to the protocol defined under 6.8. RCREEE is the designated partner for implementing the ATMP. The protocol must incorporate learnings from other projects in the region, such as increasing the number of vantage points to cover every turbine in the wind farm, ensure appropriate coverage of full daylight hours and ensure bi-annual (at the end of each season) review of fatality results to propose adaptive management if needed. Adaptive management may include adjusting dates for start/end date of each monitoring season, adjust number and location of vantage points.</p>	Migratory soaring bird collision risk management	PS6, ESR6, ESS4	Company and contractors	Procedures in place six months prior to start of operation. Implemented during operation	Procedures in place and implemented and acceptable to the lenders. Reports to the lenders and data available.	
6.7	<p>Ensure that post-construction fatality monitoring according to the protocol described in recent guidance developed by the IFC, EBRD and other lenders (IFC et al 2023<sup>1</sup>) both in spring and autumn spring seasons are undertaken (WPP and OHTL). This includes:</p> <ul style="list-style-type: none"> <li>• Carcass search</li> <li>• Bias correction trials for scavenger removal and searcher efficiency</li> <li>• A wind and wildlife expert will be hired to develop fatality rate estimates with statistical correction factors and implement this work in the field.</li> </ul> <p>Develop reporting procedures for the WPP and associated OHTL for the following:</p> <ul style="list-style-type: none"> <li>• Reporting fatalities of priority bird species to authorities and lenders in a timely manner as per the BMP, including a review of the incident by the responsible wind and wildlife expert</li> <li>• Bi-annual reports to lenders detailing the results of soaring bird migration, shutdown on demand incidents (including near-misses), damaged BFDs and energy production losses due to shut-down on demand, fatalities</li> <li>• Share survey and fatality data with the Lenders and RCREEE.</li> <li>• Implement independent monitoring/audit of post-construction fatality monitoring procedures</li> </ul>	Bird fatality monitoring	PS6, ESR6, ESS4	Company and biodiversity contractors	Six months prior to the start of operation and during operation	Fatality Monitoring procedures in place and implemented (acceptable to the lenders). Reports to the lenders and data available.	
6.8	<p>Ensure that an organisational structure is in place, including WPP personnel, for the operational phase able to support the implementation of the mitigation and monitoring measures required, including a Biodiversity Manager and a Wind and Wildlife Expert/Project Ecologist.</p>	Biodiversity risk management resources	PS6, ESR6, ESS4	Company and biodiversity contractors	Structure presented six months prior to operation	Organisation structure presented	

6.9	Liaise with relevant national authorities, organisations and RCREEE to ensure that appropriate resources are available to deliver the ATMP, specifically the turbine shut down on demand programme and fatality monitoring. This would include support for the training and capacity building of local bird observers and other resources required, including on-the-job training (additional to the trained observers) preferentially resorting to people from the neighbouring town of Ras Ghareb.	Biodiversity risk management resources	PS6, ESR6,ESS4	Company and biodiversity contractors	Prior to operation and during life of the project	Appropriate evidence provided in Company initiatives and activities training programme for local bird observers.	
6.10	Contribute to management actions that further the conservation of migratory soaring birds in the Gebel Al Zeit IBA. This would involve engagement with various third parties, including EEAA and RCREEE, and the provision monitoring data.	Biodiversity risk management resources	PS6, ESR6,ESS4	Company and biodiversity contractors	During life of the project	Evidence of collaboration	
	Support the independent expert review, including by biodiversity focussed civil society organisation experts, of approaches, protocols, procedures, criteria and resulting data related to the Project's migratory soaring bird monitoring, the ATMP and post construction fatality monitoring. This would include the disclosure of relevant information and data to support such reviews as well as active engagement with relevant stakeholders.	Biodiversity risk management	PS6, ESR6,ESS4	Company and biodiversity contractors	During life of the project	Support of independent expert review of approaches, protocols, procedures, criteria and resulting data related to the Project's migratory soaring bird monitoring, the ATMP and post construction fatality monitoring, including the disclosure of relevant information and data to support such reviews as well as active engagement with relevant stakeholders.	

ESAP#	ACTION	ENVIRONMENTAL & SOCIAL RISKS (LIABILITY/BENEFITS)	REQUIREMENT (LEGISLATIVE, EBRD ESR, BEST PRACTICE)	RESPONSIBILITY	TIMETABLE	TARGET AND EVALUATION CRITERIA FOR SUCCESSFUL IMPLEMENTATION	STATUS
<b>ESR 8, ESS 10, PS 8: CULTURAL HERITAGE</b>							
8.1	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.	Managing potential chance finds that may indicate previously unknown and unrecorded archaeological sites.	PS8, ESR8, ESS10	Company and construction contractors.	Procedure in place prior to any earthworks. Procedure implemented during earthworks.	Chance Find procedure in place and implemented.	

<sup>1</sup> <https://www.ifc.org/en/insights-reports/2023/bird-bat-fatality-monitoring-onshore-wind-energy-facilities>

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
<b>ESR 10, ESS10, PS 1: INFORMATION DISCLOSURE AND STAKEHOLDER ENGAGEMENT</b>							
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.	PS1, ESR10, ESS10	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.	PS1, ESR10, ESS10	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.	

