



Project Energy Valley

Environmental and Social Action Plan

Prepared for:

European Bank for Reconstruction and Development (EBRD)
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Cassa Depositi e Prestiti S.p.A. (CDP)

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1. ESAP Application

The Energy Valley Hybrid Solar and BESS Project involves the development of a 1.95 GW solar PV power plant, approximately 3,935 MWh of battery energy storage system (BESS) capacity and associated electrical infrastructure across four locations in Egypt. This Environmental and Social Action Plan (ESAP) applies to the Project as a whole, comprising the Abu Qir BESS, Nagaa Hammadi BESS and OHTL, Consumer Substation, and Minya Hybrid PV and BESS components. Unless otherwise specified, actions identified as applying to ALL locations apply to all four Project components. Where an action requires site-specific assessment, planning or implementation, separate deliverables will be prepared for each applicable location under the relevant Project-wide framework.

2. List of Abbreviations

Abbreviation	Meaning
ALL	All four Project locations
AQ	Abu Qir BESS
BESS	Battery Energy Storage System
CS	Consumer Substation
E&S	Environmental and Social
EEAA	Egyptian Environmental Affairs Agency
EETC	Egyptian Electricity Transmission Company
EPC	Engineering, Procurement and Construction
ESAP	Environmental and Social Action Plan
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
MH	Minya Hybrid PV and BESS
NH	Nagaa Hammadi BESS and OHTL
O&M	Operations and Maintenance
OHTL	Overhead Transmission Line
PV	Photovoltaic

ESAP#	Action	Applicable Location / Component	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
1	Assessment and Management of Environmental and Social Risks and Impacts – EBRD ESR 1, EIB Standard 1, AfDB OS 1 and IFC PS1 (applicable through CDP)							
1.1	Obtain all required environmental approvals for each of the four Project components – Abu Qir BESS and Substation, Nagaa Hammadi BESS, Substation and OHTL, Consumer Substation and OHTLs, and Minya Hybrid PV and BESS – and incorporate the applicable approval conditions into the relevant construction and operation contracts, site-specific ESMPs and the Project ESMS.	ALL	Commencement of Project activities without the required environmental approvals, non-compliance with approval conditions, regulatory enforcement, delays and unmanaged E&S impacts.	Egyptian Environmental Law No. 4 of 1994 and its Executive Regulations; EBRD ESR1; EIB Standard 1; AfDB OS1; IFC PS1.	Company, with consultant support.	Prior to Construction.	Egyptian Environmental Affairs Agency (EEAA) approval for all four Project components.	
1.2	The Company will demonstrate its efforts to engage with the Egyptian Electricity Transmission Company (EETC) to ensure that a standalone ESIA is undertaken and implemented for the approximately 1 km 220 kV OHTL connecting the Abu Qir BESS to the national grid. The ESIA will address applicable Egyptian requirements, the Lenders' applicable environmental and social standards, and good international industry practice for electrical transmission infrastructure.	AQ	Inadequate assessment and management of the OHTL's E&S risks and impacts.	Egyptian Environmental Law No. 4 of 1994 and its Executive Regulations; EBRD ESR1; EIB Standard 1; AfDB OS1; IFC PS1.	Scatec to follow up with EETC	Prior to commencement of OHTL construction or other ground-disturbing activities.	Standalone OHTL ESIA completed.	
1.3	The Company will develop and maintain a Project-wide permits register containing separate site- and component-specific entries for each of the four Project components. The register will identify all permits, licences, consents and approvals required for construction and operation, including those applicable to temporary construction facilities, grid-connection infrastructure and associated facilities. Obtain each permit, licence, consent or approval before commencing the activity for which it is required and comply with and monitor all associated conditions. The register must include, as applicable: • EEAA environmental approvals for each Project component; • Construction and building permits; • Electricity generation, storage, grid-connection and operating licences or authorisations; • Civil Defence approvals for fire-protection and emergency-response arrangements; • Approvals required for substations, transmission lines and other electrical infrastructure; • Permits and approvals for temporary construction facilities, where applicable; • Water-supply, wastewater-disposal and waste-management permits or approvals, where applicable; • Access-road, abnormal-load and heavy-equipment transportation permits, and • Any other permits, licences, consents or approvals required under applicable Egyptian legislation.	ALL	Commencement of activities without required authorisation, failure to comply with approval conditions, regulatory enforcement, fines, Project delays and unmanaged E&S impacts.	Applicable Egyptian legal, regulatory and permitting requirements; EBRD ESR1; EIB Standard 1; AfDB OS1; IFC PS1.	Company.	Initial permits register established before construction. Each authorisation obtained before the relevant activity commences. Register maintained and permits renewed throughout construction and operation.	Complete and current permits register maintained for all four Project components.	
1.4	The Company will develop, formally approve, implement and maintain Environmental and Social Management Systems for the four Project components. The ESMS will establish consistent governance, oversight, monitoring and consolidated reporting arrangements, supported by site-specific management plans and procedures proportionate to the activities and E&S risks at each Project location. The Company will require all EPC, O&M and other principal contractors to establish and maintain the organisational arrangements, competent personnel, resources, policies and procedures necessary to comply with the Project ESMS and implement the applicable site-specific Construction Environmental	ALL	Incomplete or inconsistent E&S management systems, fragmented governance across the four Project components, inadequate contractor and supplier oversight and ineffective monitoring, reporting and corrective-action	EBRD ESR1; EIB Standard 1; AfDB OS1; IFC PS1.	Company.	ESMS finalised, formally approved and operational before mobilisation for construction. Reviewed and updated before operation.	Formally approved and operational ESMS for all four Project components.	

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	and Social Management Plans or Operational Environmental and Social Management Plans. Relevant requirements will be incorporated into all subcontracts and implemented through induction, training, supervision, monitoring, auditing, reporting and corrective-action processes.		management, resulting in legal or Lender non-compliance.			Maintained throughout construction and operation.		
1.5	The Company will undertake a Climate Change Risk Assessment for each of the four Project components. The assessment will evaluate relevant acute and chronic physical climate risks over the anticipated Project lifetime using appropriate climate scenarios and time horizons, including, as applicable, extreme heat, intense rainfall, flash and pluvial flooding, high winds, dust and sandstorms, drought and water scarcity and, for Abu Qir, sea-level rise, coastal flooding and storm surge. As part of, or informed by, the Climate Change Risk Assessment, the Company will: • Complete the preliminary hydrological, hydraulic and stormwater-drainage assessment for the Consumer Substation component, including the OHTL routes and associated access and working areas; • Undertake a site-specific flood-risk and stormwater-drainage assessment for Abu Qir, addressing pluvial flooding, existing ground and drainage conditions and relevant coastal-flooding influences, and • Undertake a proportionate flood and drainage screening for the Nagaa Hammadi component, and complete any further assessment identified as necessary. The Company will incorporate the resulting adaptation, flood-resilience and drainage measures into the final Project designs, construction contracts, , emergency-response arrangements and operational inspection, monitoring and maintenance requirements.	ALL	Physical climate hazards affecting Project design, worker and community safety, asset integrity, access, drainage, water availability and operational continuity over the Project lifetime.	EBRD ESR1; EIB Standard 1; AfDB OS1; IFC PS1.	Company, with consultant support.	Assessments completed and ESIA updated after 60-day disclosure period. Identified measures incorporated before procurement, construction or commissioning, as applicable	CCRA and mitigation plan for each Project location.	
1.6	The Company will ensure each appointed EPC contractor to develop site-specific Construction Environmental and Social Management Plan (C-ESMP) and Operational Environmental and Social Management Plan (O-ESMP), be implemented and maintained for each of the four Project components. Each ESMP will incorporate the applicable ESIA commitments, final Project design, applicable approvals and Lender requirements and will include, as a minimum: • Applicable legal, permit and Lender requirements and performance limits; • Objectives and performance targets; • Defined roles, responsibilities and reporting lines for the Company, EPC contractor, operator and subcontractors, as applicable; • Site- and activity-specific mitigation and management measures; • Key performance indicators; • Monitoring parameters, locations, methods and frequencies; • Inspection, record-keeping and reporting requirements; • Incident-notification, investigation and corrective-action procedures; • Training and competency requirements, and • Implementation schedules and allocated budgets, where applicable. Each ESMP will include, as applicable, the following sub-management plans as a minimum: • Resource Efficiency Management Plan addressing water, fuel and electricity consumption; • Air Quality and Dust Management Plan (construction phase); • Noise Management Plan (construction phase); • Hazardous and Non-hazardous Waste Management Plan, including management of batteries and battery components, damaged or defective PV modules, transformer oils and other Project-specific waste streams;	ALL	Inadequate translation of E&S commitments, legal requirements and Lender standards into site-specific mitigation, monitoring and implementation arrangements, resulting in unmanaged E&S impacts and non-compliance during construction or operation.	EBRD ESR1; EIB Standard 1; AfDB OS1; IFC PS1.	Company and EPC and O&M Contractor.	Construction requirements approved before commencement of construction and implemented throughout construction. Operational requirements reviewed, updated and approved before operation and implemented throughout operation.	Construction ESMPs approved and implemented for all four Project components. Operation ESMPs approved and implemented for all four Project components.	

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	- Wastewater Management Plan; - Labour and Working Conditions Management Plan, including worker-accommodation and labour-influx measures where applicable, and - Community Health, Safety and Security Management Plan.							
1.7	The Company will establish and, where applicable, require each contractor to establish a Health, Safety and Environmental (HSE) department and an Occupational Health and Safety (OHS) committee at each Project location where the workforce reaches 50 employees or more, in accordance with Ministerial Decree 134/2003. Each OHS committee will receive basic OHS training, meet monthly and maintain minutes of its meetings. The Company will appoint a suitably qualified Project-level labour specialist to oversee compliance with labour and working-conditions requirements across all four Project components, including the performance of the Company, contractors, subcontractors and applicable supply chains. The Company will appoint suitably qualified Community Liaison Officer(s) to implement the requirements of the Stakeholder Engagement Plan (SEP), maintain engagement with affected stakeholders at each Project location and oversee the external grievance mechanism. One (1) CLO will be required as a shared resource for the Minya and Nagaa Hammadi project components and one (1) CLO will be required for the construction phase of Abu Qir.	ALL	Inadequate E&S governance and resourcing, leading to occupational health and safety incidents, labour non-compliance, ineffective contractor and supply-chain oversight, inadequate stakeholder engagement and unresolved community grievances.	Applicable Egyptian legislation, including Ministerial Decree No. 134/2003; EBRD ESR1, ESR2, ESR4 and ESR10; EIB Standards 1, 2, 8 and 9; AfDB OS1, OS2, OS4 and OS10; IFC PS1, PS2 and PS4.	Company and EPC Contractor.	Labour specialist and CLO(s) appointed before construction mobilisation. Applicable HSE departments and OHS committees established when the relevant workforce threshold is reached for each location. Operational arrangements confirmed before operation. Maintained throughout construction and operation.	Approved construction and operational organisational charts. Labour specialist and CLO(s) appointed. Required HSE departments and OHS committees established. SEP and grievance mechanism implemented.	
1.8	The Company will contractually require the EPC contractor to appoint sufficient suitably qualified environmental, social, health and safety and human resources (HR) personnel to oversee E&S performance at the relevant Project location throughout construction, in accordance with applicable Egyptian legal requirements, the Project ESMS and ESMP, and the applicable E&S requirements of EBRD, EIB, AfDB and CDP. These requirements will also apply to the management and oversight of subcontractors.	ALL	Insufficient or inadequately qualified contractor E&S, OHS and HR personnel, resulting in ineffective implementation of Project requirements, inadequate subcontractor oversight and legal or Lender non-compliance.	Applicable Egyptian legal requirements, EBRD ESR1; EIB Standard 1; AfDB OS1; IFC PS1.	Company and EPC Contractor.	Personnel appointed before EPC mobilisation and maintained throughout construction.	Contractor organisational chart and roles and responsibilities. Suitably qualified personnel appointed and present at each relevant Project location.	
1.9	The Company will contractually require each EPC and, where appointed, O&M contractor to develop and implement an ESMS aligned with the applicable Project ESMS and E&S commitments. Each contractor ESMS will include the resources, organisational structures, policies, procedures, management plans, monitoring and reporting arrangements necessary to fulfil the contractor's E&S responsibilities. These include, as a minimum: - Compliance with applicable Egyptian environmental, social, health and safety and labour laws and regulations, the Project ESMS and ESMPs, and the applicable E&S requirements of the Lenders; - Preparation and implementation of a Project-specific ESMS; - Appointment and maintenance of sufficient suitably qualified environmental, social, health and safety and HR personnel at the relevant Project location throughout construction; - Environmental, social and occupational health and safety induction, training and competency requirements; - Monitoring, inspection, record-keeping, incident-notification, investigation and periodic reporting requirements;	ALL	Inadequate contractor E&S management, resources and oversight, resulting in inconsistent implementation of Project commitments and non-compliance by contractors, subcontractors and lower-tier contractors.	EBRD ESR1; EIB Standard 1; AfDB OS1; IFC PS1.	Construction and operation contractors.	Prior to construction. Prior to operation.	EPC/O&M Contractor ESMS.	

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	Company access, supervision and audit rights and requirements for timely implementation of corrective actions, and Incorporation of the applicable requirements into all subcontracts and their implementation by subcontractors and lower-tier contractors. EPC and O&M contractors will incorporate the applicable ESMS requirements into their contracts with subcontractors and lower-tier contractors and monitor their implementation through induction, training, supervision, auditing and corrective-action processes.							
1.10	The Company will maintain a robust supply chain management system to identify, manage and remediate supply chain risks associated with labour exploitation, as well as any other significant environmental and human rights risks and impacts. The management system should provide for supply chain traceability and labour audits and third-party verification commensurate with the labour risks identified. With respect to solar and BESS supply chains, the management system will require: - 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, and for BESS products: battery assembly, cells production, refining and mining of lithium. - 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.	ALL	Forced / child labour risks	EBRD ESR1; EIB Standard 1; AfDB OS1; IFC PS1. EU Guidance on Due Diligence for EU Businesses to Address the Risk of Forced Labour in Their Operations and Supply Chains. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas. UNGC ILO Fundamental Conventions	Company management	System developed before the procurement of the solar panels and BESS products Ongoing implementation	- Updated Procurement Policy with C/F labour clauses incorporated. - Implementation of a SCMS including effective due diligence and risk screening procedures linked to procurement decisions. - Supplier Code of Conduct developed and incorporated into procurement contracts. - Reports with positive verification of supply chain contractually locked after risk screening and clearance.	
1.11	The Company will prepare, populate and maintain an environmental register and hazardous-materials and waste registers for each Project component, in accordance with Law No. 4 of 1994 and its Executive Regulations, Waste Management Law No. 202 of 2020 and other applicable legal requirements. The registers will be regularly updated and include, as applicable: - Environmental and workplace monitoring information, including air quality, noise and heat stress; - Hazardous materials used or stored, including batteries and battery chemicals, transformer oils and fire-suppression agents; - Hazardous and non-hazardous waste generation, storage, transportation, treatment and disposal, including damaged or defective PV modules, where relevant, and contaminated firefighting water; - Wastewater generation and disposal, and - Environmental incidents and relevant emergency preparedness and response records.	ALL	Incomplete environmental records and inadequate traceability of hazardous materials, waste, wastewater, monitoring results and incidents, resulting in regulatory non-compliance and ineffective E&S management.	Egyptian Environmental Law No. 4 of 1994 and its Executive Regulations; Waste Management Law No. 202 of 2020 and its Executive Regulations	Company.	Registers established before relevant construction activities commence and maintained throughout construction and operation.	Complete and current environmental and hazardous-materials and waste registers maintained for each Project component.	

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	The Company will maintain supporting monitoring reports, waste manifests, disposal certificates and other evidence and require the relevant EPC and other contractors and, where appointed, the O&M contractor to provide the information and records necessary to keep the registers complete and current. The Company will make the registers and supporting documentation available for inspection by the competent authorities and for review by the Lenders and the LESA.							
1.12	The Company will ensure that a Lenders' Environmental and Social Advisor (LESA), with a duty of care to the Lenders, is appointed to undertake independent E&S monitoring of all four Project components semi-annually during construction and once during the first year of operation for all sites. Following the first LESA monitoring exercise to Hybrid site only, the Lenders and the Company will review the findings and agree whether the monitoring frequency should be increased to quarterly. Each monitoring exercise will include site visits to the Project locations undergoing construction or operation, as applicable. As part of the LESA monitoring program for Hybrid site only, labour and occupational health and safety (OHS) audit will be undertaken at or around the peak of construction, on a date to be agreed between the Company and the Lenders. The audit will assess compliance with the Project's applicable labour and OHS standards. Any required corrective actions will be identified in the audit report and agreed with the Company. Following each monitoring exercise, the LESA will issue a report to the Lenders assessing: • The Project's E&S performance; • Compliance with the applicable environmental and social requirements of EBRD, EIB, AfDB and CDP; • Implementation of the ESMPs and this ESAP; • Compliance with the environmental and social covenants contained in the financing agreements, and • The status of identified non-compliances, corrective actions and outstanding environmental and social risks. From the second year of operation onwards, the Company will prepare and submit an annual E&S performance report to the Lenders covering all four Project components and summarising compliance, monitoring results, incidents, grievances, stakeholder engagement, ESAP implementation and corrective actions undertaken during the reporting period.	ALL	Inadequate independent oversight and reporting, resulting in unidentified or unresolved E&S non-compliances, delayed corrective actions and failure to meet Lender requirements.	EBRD ESR1; EIB Standard 1; AfDB OS1; IFC PS1	Company.	Every six months during construction and once during the first year of operations. Annual Company E&S performance reports from the second year of operation onwards.	LESA appointed and retained. E&S Monitoring Reports completed within the required periods and satisfactory to the Lenders. Annual operational reports submitted from Year 2	
1.13	The Company will prepare a site-specific Decommissioning and Site Restoration Plan for each Project component no later than two (2) years prior to the commencement of the decommissioning phase, provided that the anticipated operational lifetime of the Project extends beyond the term of the Loan, or prior to its anticipated permanent closure or, in the event of unplanned or early closure, before decommissioning activities commence. Each Plan will address, as applicable, the safe dismantling, removal, reuse or repurposing of PV modules, BESS units and batteries, substations, OHTLs, buried cables, foundations, buildings and ancillary infrastructure; management of hazardous and non-hazardous waste; assessment and remediation of contamination; site rehabilitation and restoration; occupational and community health and safety; stakeholder engagement; responsibilities; implementation schedule; cost estimates and resourcing; and post-closure monitoring. The Plans will reflect applicable legal and Lender requirements, the condition of Project infrastructure, available reuse, recycling, treatment and disposal routes and the agreed post-closure land use.	ALL	Worker and community safety risks, pollution, contamination, inappropriate waste disposal, incomplete site restoration and unresolved liabilities associated with decommissioning.	EBRD ESR1; EIB Standard 1; AfDB OS1; IFC PS1	Company.	Plans prepared no later than two years before the commencement of the decommissioning phase, provided that the anticipated operational lifetime of the Project extends beyond the term of the Loan or, for unplanned or early closure, before decommissioning commences.	Site-specific Decommissioning and Site Restoration Plan approved for each Project component.	

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	For the Nagaa Hammadi component, the Plan will specifically address interfaces with the Dandara PV Project, the shared substation and associated connection infrastructure. It will identify asset ownership, operational responsibilities, Project boundaries, remaining operational requirements, isolation arrangements, responsibilities for continued maintenance and E&S management, and allocation of decommissioning costs and liabilities. Shared or third-party infrastructure will not be removed where it remains required by Dandara, EETC or another authorised user. Any transfer, continued operation or removal of shared infrastructure will be agreed with the relevant asset owners and operators and undertaken without compromising the safety, reliability or E&S performance of the remaining facilities.							

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2	Labour and Working Conditions – EBRD ESR 2; EIB Standard 8; AfDB OS 2; IFC PS 2							
2.1	The Company will adopt and implement Scatec's Global HR Policy and associated labour-management procedures across all four Project components, in accordance with applicable Egyptian labour legislation and the labour and working-conditions requirements of EBRD ESR 2, EIB Standard 8, AfDB OS 2 and CDP. The policies and procedures will apply to the Company's direct and contracted workers, including contractor and subcontractor workers. The Company will develop and implement a Project-wide Workers' Code of Conduct, a Local Recruitment Management Plan or equivalent procedure, and a workforce training matrix. The policies and procedures will address, as a minimum: • Management of the Project workforce; • Fundamental human and labour rights; • Written terms and conditions of employment, including wages, working hours, overtime, leave, benefits and termination; • Prohibition of child labour and forced labour; • Equal opportunity, non-discrimination and fair treatment; • Prevention of and response to gender-based violence and harassment, sexual harassment, sexual exploitation and abuse; • Disciplinary and termination procedures; • Worker conduct; • Access to the Workers' Grievance Mechanism; • Transparent and non-discriminatory recruitment and prioritisation of suitably qualified members of local communities for skilled and unskilled employment to the greatest extent practicable; • Oversight and monitoring of contractor and subcontractor labour performance, and • Workforce training and competency requirements.	ALL	Inconsistent or inadequate management of direct and contracted workers, including discrimination, unfair recruitment, labour-rights violations, inappropriate worker conduct, GBVH/SEAH and inadequate workforce competency.	PR2	Company.	Policies, Code of Conduct, local-recruitment arrangements and training strategy adopted before worker mobilisation and implemented throughout construction and operation.	HR Policy and associated procedures adopted and implemented. Project-wide Workers' Code of Conduct.	
2.2	The Company will ensure that each direct worker receives a written employment contract, in a language they understand, before commencing work and is provided with a copy of the signed contract. The Company will require each contractor and subcontractor to provide the same to every worker it employs or engages on the Project. Each contract will comply with applicable Egyptian labour legislation and the Lenders' labour and working-conditions requirements and specify, as a minimum: • The nature and type of employment, job title and responsibilities; • Wages, applicable allowances and the method and frequency of payment; • Normal working hours, rest periods, overtime arrangements and applicable overtime rates; • Statutory contributions and entitlements, including social, medical and other insurance, together with any agreed monetary and non-monetary benefits; • Leave entitlements; • The duration of the contract and any probationary period; • Disciplinary, termination and notice provisions, and • Any other information required by applicable law. The Company will monitor compliance through periodic reviews of contractor and subcontractor employment documentation and worker interviews.	ALL	Informal or unclear employment arrangements, workers not understanding their employment terms, and non-compliance relating to wages, working hours, overtime, benefits, leave, social insurance, discipline or termination.	Applicable Egyptian labour legislation; EBRD ESR2; EIB Standard 8; AfDB OS2 and IFC PS2.	Company and EPC and O&M Contractors.	Written contracts issued and signed before each worker commences work. Compliance monitored throughout construction and operation.	Project employment contract.	

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2.3	The Company ESMS will cover labor management and the company will require its EPC contractors to develop and implement Labour Management Plan(s) applicable to direct and contracted workers across all four Project components and throughout construction and operation. The Plan will comply with applicable Egyptian legislation and international good practice. The Plan will address, as a minimum: • Transparent recruitment and written terms of employment; • Fair and timely payment of wages meeting or exceeding the national minimum wage; • Working hours, overtime, leave, benefits and mandatory social insurance; • Non-discrimination, equal opportunity and freedom of association; • Prohibition of child labour and forced labour; • Access to the Workers' Grievance Mechanism; • Prioritisation of suitably qualified local workers to the greatest extent practicable; • Equal terms, working conditions, pay, benefits and protections for women, migrant and non-local workers performing equivalent work, and • Unrestricted and safe access to adequate sanitation and welfare facilities, potable water, rest areas and facilities for food preparation, storage and consumption. 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.	ALL	Unfair or unlawful recruitment and employment practices, inadequate terms and working conditions, wage and working-time violations, discrimination, child or forced labour, and inadequate worker welfare.	Applicable Egyptian labour legislation; EBRD ESR2; EIB Standard 8; AfDB OS2; IFC PS2; and applicable ILO fundamental conventions.	Company and EPC and O&M Contractors.	Labour Management Plan approved before construction. Labour Management Plan reviewed and updated before operation. Implemented throughout construction and operation.	Project-wide Labour Management Plan approved and implemented.	
2.4	Prior to construction, the Company will confirm anticipated workforce numbers and categories and whether worker accommodation will be provided, arranged or facilitated by the Company or any contractor or subcontractor. Where Project-related accommodation is to be provided, arranged or facilitated, the Company will establish and implement a Worker Accommodation Management Plan, consistent with applicable Egyptian legislation and the IFC/EBRD guidance <i>Workers' Accommodation: Processes and Standards</i>. The Plan will establish requirements for: • Location, design, occupancy and privacy; • Ventilation, lighting, fire safety and emergency preparedness; • Sanitation, potable water, wastewater and waste management; • Food preparation, storage and consumption; • Housekeeping, security, freedom of movement and access to medical and welfare services, and • Access to the Workers' Grievance Mechanism. The Company will assess and approve each accommodation facility before occupation and maintain a register of all Project-related accommodation. The accommodation inspection programme will define inspection frequency, roles and responsibilities, compliance checklists, corrective-action tracking and reporting arrangements to verify ongoing compliance and timely remediation of identified deficiencies. The Company will avoid accommodation arrangements that could materially increase rents or place pressure on housing and services in nearby communities. Where such arrangements cannot be avoided, appropriate mitigation measures will be implemented.	ALL	Inadequate accommodation conditions affecting worker health, safety, welfare, dignity and security, together with potential pressure on local housing, rents, infrastructure and services.	EBRD ESR2; EIB Standard 8; AfDB OS2; IFC PS2; and IFC/EBRD guidance <i>Workers' Accommodation: Processes and Standards</i> .	Company.	Before construction.	Accommodation requirements confirmed before construction. Where accommodation is required, the Workers Accommodation Management Plan is implemented. Applicable facilities approved before occupation and maintained and monitored throughout construction and operation.	

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	The Worker Accommodation Management Plan and applicable accommodation requirements will be cascaded to all contractors and subcontractors providing, arranging or managing accommodation for their Project workforce. The Company will monitor their implementation. These requirements will apply throughout construction and operation wherever Project-related worker accommodation is provided or arranged.							
2.5	Prior to mobilisation of workers, the Company will establish and implement a public/online Workers' Grievance Mechanism, in accordance with applicable Egyptian labour legislation and the labour and working-conditions requirements of the Lenders. The mechanism will remain operational throughout construction and operation and will be accessible to all direct and contracted workers, including contractor, subcontractor and lower-tier contractor workers. The mechanism will provide accessible channels for raising grievances, including confidential channels for sensitive grievances; protect workers against retaliation; establish procedures and timeframes for acknowledging, investigating, responding to and closing grievances; allow unresolved grievances to be reviewed or escalated; and maintain appropriate records while protecting confidentiality and personal information. Use of the mechanism will not restrict workers' access to judicial, administrative or other remedies. A specific stream to address GBVH-related complaints shall be established. The Company will require contractors either to provide their workers with direct access to the Project mechanism or to establish an aligned mechanism subject to Company review and oversight. Contractor mechanisms will allow unresolved grievances to be escalated to the Company.	ALL	Inadequate identification and resolution of worker grievances, retaliation against complainants, unresolved labour disputes and restricted access to remedy for direct and contracted workers.	EBRD ESR2; EIB Standard 8; AfDB OS2; and IFC PS2.	Company and EPC and O&M Contractors.	Established before mobilisation of workers and maintained throughout construction and operation.	Workers' Grievance Mechanism operational and communicated to all direct and contracted workers. Grievance register maintained.	
2.6	The Company will develop and implement a Project-wide Security Management Plan, supported by security risk assessments and security arrangements for each Project component. The Plan will comply with applicable Egyptian legislation and Lender requirements and be consistent with the Voluntary Principles on Security and Human Rights and the IFC Good Practice Handbook on the Use of Security Forces. It will include appropriate security procedures and a code of conduct. Security personnel will be appropriately screened and vetted and trained on applicable law, human rights, appropriate conduct, de-escalation, proportional use of force and prevention of gender-based violence and harassment. The Plan will also address security incidents, grievances, monitoring of security providers, contractor requirements and coordination with public security forces, where applicable. Private security personnel will be unarmed. The security risk assessments will be completed before mobilisation for each Project component and reviewed before operation and following any material change in security risks or arrangements. Identified risks and mitigation measures will be incorporated into the applicable construction and operational security arrangements.	ALL	Risks to workers and communities arising from unauthorised access, security incidents, inappropriate conduct or use of force by security personnel, human-rights violations and GBVH.	Applicable Egyptian legislation; EBRD ESR2 and ESR4; EIB Standards 8 and 9; AfDB OS2 and OS4; IFC PS2 and PS4; the Voluntary Principles on Security and Human Rights; and applicable IFC guidance on the use of security forces.	Company and EPC and O&M Contractors.	Security risk assessments and Plan completed before mobilisation. Reviewed and updated before operation and following any material change in security risks or arrangements. Implemented throughout construction and operation.	Project-wide Security Management Plan and site-specific risk assessments completed and implemented.	

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3	Resource Efficiency and Pollution Prevention and Control – EBRD ESR 3; EIB Standard 3; AfDB OS 3; IFC PS 3							
3.1	The Company will ensure that site-specific Air Quality and Noise Management Plans are developed and implemented for the construction phase of each Project component. The Plans will identify sensitive receptors and applicable standards and define measures to minimise dust, emissions and noise affecting workers and nearby communities, including dust suppression, equipment inspection and maintenance, work scheduling and noise controls. They will also establish monitoring parameters and locations, monitoring frequencies, responsibilities, reporting and corrective-action procedures. The relevant EPC contractors will implement the Plans and flow the applicable requirements down to their subcontractors.	ALL	Adverse effects on workers and nearby communities arising from construction dust, air emissions, noise and vibration.	Applicable Egyptian legislation; EBRD ESR 3; EIB Standard 3; AfDB OS 3; IFC PS 3; and applicable World Bank Group EHS Guidelines.	Company and EPC contractor.	Plans approved before construction and implemented throughout the construction phase..	Site-specific Air Quality and Noise Management Plans approved and implemented for all Project components. Sensitive receptors and monitoring requirements identified.	
3.2	Prior to construction at each Project component, the Company will require the relevant EPC contractor to develop and implement a Resource Efficiency Management Plan covering water and energy use during construction. For solar panel cleaning, a waterless solution must be preferred.. The Plan will quantify water requirements (including construction of workforce water requirements). identify authorised water sources with sufficient capacity and establish measures to minimise water consumption, including leak detection and repair, water-efficient fixtures and, where legally permitted and suitable, reuse of greywater or treated wastewater. It will also establish energy-efficiency measures, including efficient equipment selection, preventive maintenance, reduced idling and monitoring of fuel and electricity consumption. The Plan will define roles and responsibilities, performance indicators and reduction targets, monitoring and reporting requirements and corrective actions.	ALL	Excessive or inefficient water, fuel and electricity consumption; use of unauthorised or insufficient water supplies; increased pressure on local water resources; and avoidable emissions and operating costs.	Applicable Egyptian legislation; EBRD ESR3; EIB Standard 3; AfDB OS3; IFC PS3; and applicable World Bank Group EHS Guidelines	Company and EPC contractors.	Plan developed and approved before construction at each Project component. Plan implemented throughout construction	Resource Efficiency Management Plans approved and implemented.	
3.3	The Company will ensure that Waste Management and Wastewater Management Plans are developed and implemented for each Project component in accordance with Egyptian legislation and applicable Lender requirements. The Waste Management Plans will address the segregation, storage, handling, transportation, recycling and authorised disposal of hazardous and non-hazardous waste. The Wastewater Management Plans will address the collection, storage, transportation, treatment and authorised discharge or disposal of wastewater; prevention of soil and groundwater contamination; and emergency-response procedures. Require PV panels and BESS 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) : • 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.	ALL	Pollution of soil, surface water and groundwater; risks to workers and communities; and unauthorised disposal arising from the inadequate management of hazardous and non-hazardous waste and wastewater.	Applicable Egyptian legislation; EBRD ESR3; EIB Standard 3; AfDB OS3; IFC PS3; and applicable World Bank Group EHS Guidelines.	Company and EPC and O&M contractors.	Plans approved before construction and implemented throughout construction. Plans reviewed and updated before operation and implemented throughout operation, as applicable.	Approved and implemented Waste Management and Wastewater Management Plans for each Project component. Licensed contractors and receiving facilities verified.	

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	Before wastewater is transferred off site, the Company will verify that the wastewater contractor and receiving facility are appropriately licensed and that the facility has sufficient capacity and technical capability to accept and treat the anticipated wastewater. The Plans will define roles and responsibilities, monitoring, reporting and corrective-action requirements. Waste and wastewater registers will record quantities generated, stored, transferred, treated and disposed of.							
3.4	The Company will develop and implement a Hazardous Materials Management Plan across all four Project components. The Plan will include, as applicable: - Controls to prevent access by unauthorised persons; - Secure, covered and appropriately ventilated storage; - Impermeable flooring and appropriately designed drainage, collection pits or sumps to prevent releases to soil, groundwater or stormwater systems; - Spill-containment pallets, bunding or other appropriate secondary containment of sufficient capacity; - Segregation of incompatible materials; - Clearly labelled containers identifying their contents and associated hazards; - Readily accessible safety data sheets, handling instructions and warning signage; - Fire-detection, fire-fighting, spill-response and emergency equipment appropriate to the materials stored, including absorbents, spill kits and personal protective equipment, and - Routine inspection, inventory control and maintenance requirements. The Company will require the relevant EPC and other contractors and, where appointed, the O&M contractor, as applicable, to implement these requirements and flow them down to relevant subcontractors. The Company will monitor compliance throughout construction and operation.	ALL	Spills and releases to soil, groundwater or stormwater; fire and incompatible-material reactions; worker exposure; and unauthorised access to hazardous materials.	Applicable Egyptian legislation; EBRD ESR3; EIB Standard 3; AfDB OS3; IFC PS3; and applicable World Bank Group EHS Guidelines.	Company and EPC contractor.	Plan developed and applicable storage arrangements established before hazardous materials are brought to the relevant Project location.	Hazardous Materials Management Plan approved and implemented. Permanently established hazardous material storage area meeting Egyptian regulatory requirements and international good practice.	
3.5	Prior to construction at each Project component, the Company will ensure that appropriately sized waste-storage areas are established for the temporary and segregated storage of hazardous and non-hazardous waste pending off-site disposal. Each storage area will include: - Restricted access; - Segregated and clearly labelled storage for hazardous and non-hazardous waste; - Appropriate signage and weather protection; - Impermeable flooring and secondary containment for liquid waste; - Adequate ventilation, where required, and - Appropriate spill-response and fire-safety provisions. Before the first off-site transfer of each waste stream, the Company will confirm the proposed disposal route and receiving facility and verify that the waste contractor and facility hold the licences and authorisations required by the EEAA and WMRA under applicable Egyptian legislation, including Law 4/1994 and Law 202/2020. The Company will require waste manifests or equivalent transfer documentation for each disposal trip and maintain records of the waste type, quantity, transporter, receiving facility and disposal or recovery method. Relevant EPC and, where appointed, O&M contractors will implement these requirements and cascade them to their subcontractors.	ALL	Soil, surface-water and groundwater contamination; fire, spills and worker exposure; mixing or inappropriate handling of hazardous and non-hazardous waste; and unauthorised transport or disposal.	Applicable Egyptian legislation; EBRD ESR3; EIB Standard 3; AfDB OS3; IFC PS3; and applicable World Bank Group EHS Guidelines.	Company and EPC and O&M contractors.	Construction waste-storage areas established before waste generation begins. Operational waste-storage arrangements established before operation. Disposal contractors and receiving facilities verified before the first transfer of each waste stream. Requirements maintained throughout construction and operation.	Waste-storage areas established at each applicable Project location, constructed to meet Egyptian regulatory requirements and international good practice. Contracts with waste disposal contractors holding valid licenses. Waste manifests and tracking registers maintained.	

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4	Health, Safety and Security – EBRD ESR 4; EIB Standard 9; AfDB OS 4; IFC PS 4							
4.1	The Company will require each EPC contractor and, where appointed, the relevant O&M contractor to develop and implement an Occupational Health and Safety Management Plan for their respective construction or operational activities. Where the Company undertakes O&M directly, it will develop and implement the operational Plan. Each Plan will be based on documented occupational health and safety risk assessments and address relevant hazards, including, as applicable, electrical work and electrocution, energised equipment, working at height, lifting operations, excavation, moving vehicles and machinery, hazardous materials, fire and explosion, heat stress and BESS-related hazards. The OSHMP shall include a LOTO procedure for all assets and appropriate training provision. The Plans will include safe systems of work; permit-to-work and lock-out/tag-out procedures; task-specific risk assessments and job-safety analyses; competency and training requirements; personal protective equipment; contractor and subcontractor controls; incident and near-miss reporting, investigation and corrective action; emergency-response arrangements; and inspection, monitoring and reporting requirements. The Company will monitor occupational health and safety performance and require identified deficiencies to be addressed through time-bound corrective actions. Project wil Monitor weather Condition's to implement controls to manage Heat stress, and those control's will be iincluded in the relevant risk assessment	ALL	Occupational health and safety risks to Project workers, including work-related injury, ill health and fatality during construction and operation.	Applicable Egyptian legislation; EBRD ESR2 and ESR4; EIB Standards 8 and 9; AfDB OS2 and OS4; IFC PS2 and PS4; and applicable World Bank Group EHS Guidelines.	Company, EPC and O&M contractor.	Construction OHSMP developed and approved before construction. Operational OHSMP developed and approved before operation. Plans implemented and maintained throughout the applicable phase.	Approved OHSMPs supported by documented risk assessments. Permit-to-work and lock-out/tag-out systems implemented. Competency, training, inspection and monitoring records maintained. i	
4.2	As part of the OHSMPs, the Company shall require the EPCs and O&M contractors to Minimize the risk of serious consequences from snake bite or scorpion sting: - 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 withankle-high shoes or boots. - Do not allow personnel / workers working alone inside the PV land plot. - Annually check 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.	ALL	Occupational health and safety risks to Project workers, during construction and operation.	Applicable Egyptian legislation; EBRD ESR2 and ESR4; EIB Standards 8 and 9; AfDB OS2 and OS4; IFC PS2 and PS4; and applicable World Bank Group EHS Guidelines.	Company, EPC and O&M contractor.	Construction OHSMP developed and approved before construction. Operational OHSMP developed and approved before operation. Plans implemented and maintained throughout the applicable phase.	Updated OHSMPs	
4.3	Prior to mobilisation at each Project component, the Company will require the relevant EPC contractor to undertake a medical and emergency-response needs assessment based on the anticipated workforce, Project hazards, site remoteness, travel time to suitable medical facilities and the availability and capability of local emergency services.	ALL	Delayed or inadequate treatment of occupational injuries and medical emergencies; worker fatalities or serious health consequences;	Applicable Egyptian legislation; EBRD ESR2 and ESR4; EIB Standards 8 and 9; AfDB OS2 and OS4; IFC PS2 and PS4.	Company and Contractor.	Needs assessments completed before workforce mobilisation. Required medical and emergency-response	Medical and emergency-response needs assessments completed for all components. Required facilities, equipment, personnel and	

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	Based on the assessment, the EPC contractor will provide appropriately staffed and equipped on-site medical facilities, trained first-aid personnel, emergency medical equipment and suitable ambulance arrangements, as required. For the Minya Hybrid component, the assessment will specifically determine the need for an on-site clinic staffed by qualified medical personnel and a dedicated, fully equipped ambulance. The contractor will establish and periodically test arrangements with suitable receiving hospitals and emergency services. Antivenom and other specialised treatments will be provided where supported by the risk assessment and where appropriate storage, clinical governance and administration by qualified medical personnel can be assured.		insufficient local emergency-service capacity; pressure on local medical facilities.			arrangements established before relevant construction activities commence and maintained throughout construction.	ambulance arrangements provided.	

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4.4	Prior to mobilisation of the main construction workforce at each Project component, the Company will confirm anticipated workforce numbers, origin and mobilisation schedule and the proposed accommodation and transport arrangements. The Company will assess, proportionate to the workforce and risks at each location, potential impacts on housing, services, infrastructure, transport, community health and safety, worker-community interactions and GBVH/SEAH risks. For the Minya Hybrid and Consumer Substation components, the assessment will consider the combined workforce and cumulative demand associated with other existing, planned or reasonably foreseeable major projects, including the West Minya Solar Project, where construction programmes could overlap. Where an assessment identifies material worker-influx risks, the Company will require the relevant EPC contractor to develop and implement a site-specific Workers' Influx Management Plan proportionate to the identified risks. A coordinated Plan will be developed for the Minya Hybrid and Consumer Substation components. Each applicable Plan will address, as relevant, local recruitment, accommodation, transport, pressure on local services, worker-community interactions, communicable diseases, security, GBVH/SEAH, workers' codes of conduct, worker and community grievances, workforce monitoring and demobilisation. The Company will coordinate and monitor implementation and update the assessments and applicable Plans where material information on workforce numbers, construction schedules or cumulative impacts becomes available.	ALL	Pressure on local housing, services and infrastructure; community health and safety; worker-community conflict; communicable diseases; security and GBVH/SEAH risks; cumulative workforce impacts.	Applicable Egyptian legislation; EBRD ESR2 and ESR4; EIB Standards 8 and 9; AfDB OS2 and OS4; IFC PS2 and PS4.	Company, EPC and O&M contractors.	Workforce and influx assessments completed before construction. Applicable Plans developed before construction and maintained throughout construction and demobilisation.	Workforce and influx assessments completed for all applicable locations. Site-specific or coordinated Workers' Influx Management Plans developed where material risks are identified.	
4.5	Prior to the commencement of material transport activities, the Company will ensure that a proportionate traffic and road-safety assessment is completed for each Project component. The assessment will identify proposed transport routes, road and access constraints, sensitive receptors, anticipated vehicle movements and abnormal loads, cumulative use of shared routes and required mitigation measures. The Company will ensure that a site-specific Traffic and Road Safety Management Plan is developed and implemented for each Project component in accordance with applicable Egyptian traffic laws and regulations. Each Plan will address the transport of Project materials and workers and include, as a minimum: • Approved routes and journey-management arrangements; • Vehicle inspection and preventive-maintenance requirements; • Driver training, competency and capacity validation; • Traffic and road-safety key performance indicators; • Procedures for recording and addressing traffic violations, incidents and near misses, and • Monitoring, reporting and corrective-action requirements. The Company will require each EPC contractor and, where appointed, the relevant O&M contractor to implement the applicable Plan and cascade its requirements to subcontractors, suppliers and transport providers.	ALL	Traffic accidents and injuries affecting workers, communities and vulnerable road users; disruption of access and traffic flows; nuisance and cumulative impacts on shared routes.	Applicable Egyptian legislation; EBRD ESR4; EIB Standard 9; AfDB OS4; IFC PS4; and applicable World Bank Group EHS Guidelines.	Company, EPC and O&M contractors.	Assessment and construction-phase Plan completed before material transport activities commence. Operational arrangements completed before operation.	Site-specific traffic and road-safety assessments completed. Traffic and Road Safety Management Plans.	

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4.6	The Company will develop and implement a site-specific Emergency Preparedness and Response Plan for each Project component, covering construction and operation. Each Plan will be based on documented emergency-risk assessments, the final Project design and relevant equipment-manufacturer requirements and will be proportionate to the activities and risks at the applicable location. The Plans will be reviewed and updated before operation and following any material change in emergency risks or arrangements. Each Plan will address, as applicable: • Credible emergency scenarios, including fire, explosion, electrical incidents, hazardous-material spills, flooding, extreme heat, severe weather and earthquakes; • For BESS components, thermal runaway, battery fire, explosion, smoke and hazardous-gas release, emergency isolation and shutdown and containment and management of contaminated firefighting water; • Emergency roles, responsibilities, command arrangements and decision-making authority; • Training and competency requirements for specialised emergency-response personnel; • Emergency communication, alarm, warning and notification systems and protocols; • Current contact details for internal and external emergency responders and relevant authorities; • Coordination and joint-response arrangements with fire, medical, environmental and other external emergency services; • Site and evacuation maps showing emergency access and evacuation routes, assembly points, first-aid facilities, automated external defibrillators, firefighting systems, spill-response resources, emergency equipment and emergency-response personal protective equipment, as applicable; • Procedures for using, inspecting, testing and maintaining emergency equipment and facilities; • Emergency medical response and casualty evacuation; • Containment, decontamination, pollution control, site recovery and management of emergency-related waste; • A programme of drills and exercises proportionate to the identified scenarios, involving external responders and potentially affected communities where appropriate, and • Recording, investigation and reporting of emergency events and drills and implementation of time-bound corrective actions. Potentially affected communities will be incorporated into emergency planning through appropriate consultation, risk communication, warning and notification arrangements and, where relevant, evacuation or shelter-in-place procedures. Information necessary for effective emergency response will be provided to relevant authorities, external emergency services and affected communities. The Company will require the relevant EPC contractor and, where appointed, O&M contractor to comply with and implement the applicable Plan and develop any supporting procedures necessary for their activities. Where the Company undertakes O&M directly, it will implement the operational requirements.	ALL	Risks to workers, nearby communities, the environment and Project assets arising from fires, explosions, electrical incidents, hazardous-material releases, natural hazards and other emergency events.	Applicable Egyptian legislation; EBRD ESR2 and ESR4; EIB Standards 8 and 9; AfDB OS2 and OS4; IFC PS2 and PS4; and applicable World Bank Group EHS Guidelines.	Company and Contractors.	Prior to construction. Prior to operation.	Site-specific Emergency Preparedness and Response Plan for each Project component (4).	

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6	Biodiversity Conservation and Sustainable Management of Living Natural Resources – EBRD ESR 6; EIB Standard 4; AfDB OS 6; IFC PS 6							
6.1	The various fencing shall allow for reptile passage .	MH	Biodiversity corridor continuity	EBRD ESR 6 EIB Standard 4	Developer	During design	Provision of evidence of reptile passages	
6.2	Avoid permanent lighting of the various sites during construction or operation, to avoid night habitat disturbance. Where night light is needed for safety / security reasons, use low intensity lights directed to the ground, controlled by presence detectors and a time- switch.	ALL	Biodiversity protection	EBRD ESR6 EIB Standard 4	Developer	During construction and operation	Limit permanent light during nighttime.	

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8	Cultural Heritage – EBRD ESR 8; EIB Standard 10; AfDB OS 8; IFC PS 8							
8.2	The Project will require each EPC contractor to develop and implement a site-specific Chance-Find Procedure before commencing site clearance, excavation or other ground-disturbing activities at the relevant Project location. The Procedure will define requirements for: • Immediately suspending work in the vicinity of a suspected archaeological, palaeontological or other cultural-heritage find; • Securing the area and protecting the find from disturbance, damage, removal or theft; • Promptly notifying the Company and the relevant Egyptian authorities; • Obtaining assessment by a suitably qualified cultural-heritage specialist, where required; • Consulting and obtaining authorisation from the competent authorities before work resumes; • Documenting the find, notifications, decisions and actions taken, and • Training and awareness for relevant workers, contractors and subcontractors. The Procedure will be incorporated into the applicable C-ESMP and communicated to all personnel undertaking or supervising ground-disturbing activities.	ALL	Damage, disturbance, removal or loss of previously unidentified archaeological, palaeontological or other cultural-heritage resources during ground-disturbing activities.	Applicable Egyptian cultural-heritage legislation; EBRD ESR8; EIB Standard 10; AfDB OS8; IFC PS8; and GIIP for managing chance finds.	Company and EPC Contractor.	Procedure in place prior to earth works. Procedure implemented during earth works.	Chance Find procedure in place and implemented.	

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10	Information Disclosure and Stakeholder Engagement – EBRD ESR 10; EIB Standard 2; AfDB OS 10; IFC PS 1							
10.1	The Company will implement and maintain the Stakeholder Engagement Plan developed for the Project across all four Project components throughout construction and operation, including the public grievance mechanism contained in the SEP. The Company will ensure that the grievance mechanism is accessible and clearly communicated to affected communities and will periodically review and update the SEP to reflect changes in Project activities, stakeholders, impacts and engagement needs. Relevant EPC and, where appointed, O&M contractors will support implementation of the SEP under the Company's oversight.	ALL	Inadequate stakeholder engagement, information disclosure and management of community concerns and grievances, potentially resulting in unresolved impacts, exclusion of affected or vulnerable stakeholders, community opposition and reputational risk.	PR10	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	The Company will develop and implement a survivor-centred grievance mechanism for grievances relating to gender-based violence and harassment and sexual exploitation, abuse and harassment linked to the Project. The mechanism will be integrated with the public and Workers' Grievance Mechanisms and reflected in the Project SEP. The mechanism will provide for confidential, safe and accessible reporting; protection against retaliation; handling by appropriately trained personnel; survivor consent and control over information; referral to appropriate medical, psychosocial, legal and protection services; and secure record-keeping and reporting that protects survivor confidentiality. The Company will require relevant EPC and, where appointed, O&M contractors to communicate the mechanism to their workers, enable access and cooperate with its implementation.	ALL	GBVH/SEAH affecting Project workers or community members.	PR10	Company and contractors	During all project phases.	Worker Grievance Mechanism Community Grievance Mechanism	

