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No.	Action	E&S Risks (Liability/Benefits)	Requirement (Legal, EBRD PR, Best Practice)	Resources, Investment needs, Responsibility	Timetable	Target & Evaluation Criteria for Successful Implementation
<b>PR1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>						
<b>PR 1.1</b>	Complement the ESIA with a risk assessment that considers gender aspects and risks caused by climate change.	<ul style="list-style-type: none"> <li>E&amp;S Risk Assessment</li> </ul>	EBRD PR 1; Best Practice	Samta HSSEC management	Prior to Const.	<ul style="list-style-type: none"> <li>Technical / summary note on gender and climate change risks, which identifies and proposed mitigation to significant risk.</li> </ul>
<b>PR 1.2</b>	Cascade the Samta corporate, global ESMS to the Project-level. This is to include Project-level policies and procedures, etc., and an overarching ESMS document describing the ESMS with references to policies and procedures should be developed.	<ul style="list-style-type: none"> <li>ESMS</li> </ul>	EBRD PR 1; Best Practice	Samta HSSEC management	Prior to Const.	<ul style="list-style-type: none"> <li>Project-level ESMS in line with PR1 requirements.</li> </ul>
<b>PR 1.3</b>	In the HSSEC Policy, include general guidelines on the need to identify vulnerable groups, assess risks to them, and develop adequate control measures to manage risks to the most vulnerable.	<ul style="list-style-type: none"> <li>E&amp;S Policy</li> </ul>	EBRD PR 1; Best Practice	Samta HSSEC management	Prior to Const.	<ul style="list-style-type: none"> <li>Updated HSSEC policy including vulnerable groups assessment and controls.</li> </ul>
<b>PR 1.4</b>	Develop a Project-level ESMP based on the impacts and aspects of the Project, with appropriate details of mitigation measures, associated responsibilities, frequencies and monitoring and reporting requirements.	<ul style="list-style-type: none"> <li>ESMP</li> </ul>	EBRD PR 1; Best Practice	Samta HSSEC management	Prior to Const.	<ul style="list-style-type: none"> <li>Project-level ESMP in line with PR requirements.</li> </ul>
<b>PR 1.5</b>	Clearly define and communicate Project HSSEC roles and responsibilities and provide adequate support and human and financial resources on an ongoing basis to achieve effective and continuous environmental and social performance.	<ul style="list-style-type: none"> <li>Organisational capacity and commitment</li> </ul>	EBRD PR 1; Best Practice	Samta HSSEC management	Prior to Const.	<ul style="list-style-type: none"> <li>Project-level HSSEC resources and skills assessment and associated resourcing and training plan.</li> <li>Project-level organogram detailing the roles and responsibilities of all staff with</li> </ul>

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						<p>HSSEC responsibilities across all Project phases.</p> <ul style="list-style-type: none"> <li>Communication of responsibilities to relevant personnel.</li> </ul>
<b>PR 1.6</b>	Identify Contractor roles and responsibilities in the ESMP and include these in tender documents / contracts as appropriate.	<ul style="list-style-type: none"> <li>Contractor E&amp;S Risk</li> </ul>	EBRD PR 1; Best Practice	Samta HSSEC management	Prior to contractor appointment	<ul style="list-style-type: none"> <li>Contractor roles and responsibilities identified in ESMP.</li> <li>Inclusion of relevant ESMP requirements in contractor tender / contract documentation.</li> </ul>
<b>PR 1.7</b>	Update the HSSEC Evaluation Matrix to include security and community risks.	<ul style="list-style-type: none"> <li>Contractor E&amp;S risks</li> </ul>	EBRD PR 1; Best Practice	Samta HSSEC management	Prior to Const.	<ul style="list-style-type: none"> <li>Inclusion of Security and Community aspects in the HSSEC Contractor Evaluation Matrix.</li> </ul>
<b>PR 1.8</b>	Identify and assess social risks associated with the primary supply chain of the Project and provide mitigation measures to manage identified risk.	<ul style="list-style-type: none"> <li>Supply chain E&amp;S risks</li> </ul>	EBRD PR 1; Best Practice	Samta HSSEC management	Prior to CSU.	<ul style="list-style-type: none"> <li>Social risk assessment on suppliers, including completed supplier surveys.</li> </ul>
<b>PR 1.9</b>	Report to EBRD on an Annual basis on E&S performance of the project and ESAP progress	<ul style="list-style-type: none"> <li>Monitoring and reporting</li> </ul>	EBRD PR 1: Loan Agreement	Samta HSSEC management	annual E&S reports - AESR - due 90 days after each financial close	<ul style="list-style-type: none"> <li>Reporting template (to be agreed between EBRD and Samta)</li> <li>E&amp;S performance reporting to EBRD</li> </ul>

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<b>PR2: LABOUR AND WORKING CONDITIONS</b>						
<b>PR 2.1</b>	Translate HR policies to local language and develop clear guidelines on how and when to communicate them to workers	<ul style="list-style-type: none"> <li>Right to information</li> <li>Improved worker relationship</li> </ul>	EBRD PR2	Samta HR	Pre-Const	<ul style="list-style-type: none"> <li>Policies translated and guidelines developed and implemented</li> </ul>
<b>PR 2.2</b>	Establish procedures and develop/acquire tools necessary to ensure that the company respects workers' rights to privacy and data protection	<ul style="list-style-type: none"> <li>Privacy and data protection</li> </ul>	EBRD PR2	Samta IT	Pre-Const	<ul style="list-style-type: none"> <li>Data protection system running</li> <li>Procedure developed and implemented</li> </ul>
<b>PR 2.3</b>	Include an express commitment not to employ forced labour in the Company's HR policies, developing internal guidance with definition and indicators of forced labour to increase internal capacity and set clear guidelines on how to manage the risk.	<ul style="list-style-type: none"> <li>Forced labour</li> </ul>	EBRD PR2; Best practice	Samta HR  Human rights specialists	Pre-Const	<ul style="list-style-type: none"> <li>Policies revised and guidelines developed and implemented.</li> </ul>
<b>PR 2.4</b>	Develop a policy on prevention of Sexual Harassment at the Workplace for the Project, based on Moroccan legal and social context, in local language.  Ensure that it requires site management to offer compulsory training on violence and harassment prevention and reporting to own workers and contractor workers.	<ul style="list-style-type: none"> <li>Sexual harassment at the workplace</li> </ul>	EBRD PR2; Best practice	Samta HR  External consultants - Human rights specialists	Pre-Const - Operations	<ul style="list-style-type: none"> <li>Policy developed and implemented.</li> <li>Compulsory training content developed.</li> <li>Own workers trained on prevention of sexual harassment at the workplace.</li> <li>Contractor workers trained on prevention of sexual harassment at the workplace</li> </ul>
<b>PR 2.5</b>	Include express reference to the rights to freedom of association and collective bargaining and a commitment not to discriminate and retaliate workers participating in unions and	<ul style="list-style-type: none"> <li>Freedom of association and collective bargaining</li> </ul>	EBRD PR2; Best practice	Samta HR	Pre-Const	<ul style="list-style-type: none"> <li>Inclusions made to the Code of Business Conduct and HR &amp; Administration Policy.</li> </ul>

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	<p>collective bargaining in the Company's Code of Business Conduct and the local HR &amp; Administration Policy.</p> <p>In the onboarding checklist for the Project, include the step of informing workers about these rights and include information about this in the induction programme.</p> <p>Include clear guidelines in the HR and Administration Policy to ensure that (i) information on workers' representatives at the workplace should be made accessible to all workers, for example, on a company notice board or on the company intranet and that (ii) workers are free to meet and discuss workplace issues on the premises during scheduled breaks and before and after work.</p> <p>Engage with the relevant workers' unions or workers' representatives in accordance with national law and provide them with information needed for meaningful negotiation in a timely manner.</p>					<ul style="list-style-type: none"> <li>New versions of the Code and HR &amp; Administration Policy communicated to workers – posted on dashboards at the site, in workers' breakrooms, and publicized in internal newsletter/intranet, etc.</li> <li>New step included in onboarding checklist.</li> <li>Information included in the induction programme.</li> <li>Company engaging with workers' unions and representatives in a timely and meaningful manner. Where applicable, collective bargain agreements have been entered into and are followed by the Company</li> </ul>
<b>PR 2.6</b>	Review the HR and Administration Policy to include clear wording that overtime is to happen exceptionally and should be, in any circumstance, voluntary, and that no workers should be pressured or suffer any retaliation of punishment for refusing to perform overtime – except when needed to prevent imminent accidents.	<ul style="list-style-type: none"> <li>Working conditions</li> <li>Excessive working hours</li> </ul>	EBRD PR2	Samta HR	Pre-Const	<ul style="list-style-type: none"> <li>Inclusions made to the HR &amp; Administration Policy and the PLA.</li> <li>New version of the HR and Administration Policy communicated to workers.</li> </ul>

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	<p>Review the Code of Conduct to include clear wording that overtime is to happen exceptionally and should be, in any circumstance, voluntary, and that no workers should be pressured or suffer any retaliation of punishment for refusing to perform overtime – except when needed to prevent imminent accidents.</p> <p>Review the HR and Administration Policy to include guidelines on ensuring that migrant workers are engaged in equivalent terms, including contractor workers.</p>					
<b>PR 2.7</b>	Develop a procedure with guidelines on collective dismissals requiring that the company analyse viable alternatives.	<ul style="list-style-type: none"> <li>Retrenchment</li> </ul>	EBRD PR2	Samta HR	Pre-Op	<ul style="list-style-type: none"> <li>Procedure developed.</li> <li>HR team and leadership aware of the procedure</li> </ul>
<b>PR 2.8</b>	<p>For the Project in Morocco, develop a local version or an attachment of the Code of Business Conduct that provides clear information on how Project workers can access the local grievance mechanism.</p> <p>Develop a process for the Project's workers to report on sexual harassment that is based on the social and legal context of Morocco or, if this is the case, ensure that workers are aware that the Grievance mechanism is the adequate means to report these claims.</p> <p>Ensure that all policies relevant to grievance reporting, whistle blowing, and harassment reporting are translated to local language and communicated to workers.</p>	<ul style="list-style-type: none"> <li>Effective grievance mechanism</li> </ul>	EBRD PR2	Samta HR	Pre-Op	<ul style="list-style-type: none"> <li>Code of Business Conduct reviewed/attachment developed with local information on grievance mechanism.</li> <li>Sexual Harassment reporting process developed / clarified information on how to report a sexual harassment claim through the operational level grievance mechanism.</li> <li>Policies and procedures translated to local language and communicated to workers – posted in site's dashboards, signs posted in workers'</li> </ul>

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						breakrooms, publicized in internal communications
<b>PR 2.9</b>	Expressly mention the EBRD PRs among the standards that contractors should comply with in the HSEC Contractor Requirements Policy, especially in regard to respecting legal limits to working hours, ensuring overtime is voluntary, ensuring adequate payment of wages and benefits, ensuring workers' health and safety, and the prohibition of forced and child labour. Periodic labour audits against EBRD requirements during construction should be carried out as part of the ESMP.	<ul style="list-style-type: none"> <li>Working conditions (contractor workers)</li> </ul>	EBRD PR2	Samta HR	Pre-Const	<ul style="list-style-type: none"> <li>HSEC Contractor Requirements revised.</li> <li>EPS General Terms and Conditions revised.</li> <li>PMC Contract revised.</li> <li>ESMP requirement for period labour audits against EBRF requirements.</li> </ul>
<b>PR 2.10</b>	<p>Carry out a forced labour and child labour risk assessment for the Project's main suppliers (scraps suppliers) in line with human rights due diligence good practices, i.e., assessing risks based on severity and likelihood as established in the UNGPs. Consider commissioning the assessment to an independent third party with expertise in supply chain human rights due diligence to ensure impartiality.</p> <p>Disengage from any supplier associated with identified forced or child labour practice.</p>	<ul style="list-style-type: none"> <li>Supply chain risks</li> </ul>	EBRD PR2; Best Practice	<p>Samta HR</p> <p>External consultants - Human rights supply chain due diligence specialists</p>	Prior to Ops Updated with on-boarding of new suppliers	<ul style="list-style-type: none"> <li>Forced labour and child labour risk assessment on suppliers, including completed supplier surveys.</li> <li>Supplier policies as per KPI 2.10.2 of the ESDD Gap Closure Plan, if required.</li> </ul>

PR3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION

<b>PR 3.1</b>	Assess and incorporate feasible energy efficiency processes and technology as detailed in the EU	<ul style="list-style-type: none"> <li>Climate change and GHG emissions</li> </ul>	Best Practice	Include in EPS scope	Prior to Const.	<ul style="list-style-type: none"> <li>Design report detailing the assessment, selection criteria and incorporation motivation of</li> </ul>
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	<p>IED Best Available Technologies during detailed plant design.</p> <ul style="list-style-type: none"> <li>Consider the following generally applicable BATs: <ul style="list-style-type: none"> <li>Regenerative burners, recuperative burners, heat exchangers and boilers to recover heat.</li> <li>Use of hot gases from the melting stages to preheat furnace charge.</li> <li>Recirculation of contaminated exhaust gas back through an oxy-fuel burner.</li> </ul> </li> <li>Consider specific Al and Cu processing techniques listed in BAT 22 and BAT 75, as applicable.</li> </ul>	<ul style="list-style-type: none"> <li>Energy efficiency</li> </ul>				<p>energy efficiency processes and technology into the final design. The report should specify anticipated energy savings.</p>
<b>PR 3.2</b>	<p>Assess the ability of the AFZ park administrator to provide water without causing potential cumulative impacts of water abstraction upon third-party users and local ecosystems. This assessment should also consider the potential effects of climate change.</p> <p>Implement appropriate mitigation measures to mitigate such risks and impacts in accordance with the mitigation hierarchy approach and Good Industry Practice (GIP). With respect to rainfall, the ESIA provide rainfall data which can be used to estimate rainwater volumes that can be collected.</p>	<ul style="list-style-type: none"> <li>Water efficiency</li> </ul>	Best Practice	<p>Samta to assess water supply.</p> <p>GIP incorporation to be included in EPS scope</p>	Prior to Const.	<ul style="list-style-type: none"> <li>Technical note providing a sustainability assessment of the AFZ water supply. This must include consideration of potentially impacts third party water users and ecosystem services.</li> <li>All technically and financially feasible and cost-effective opportunities for water minimisation and recovery in accordance with GIP will be identified and considered as part of the project design (including quantification of rainwater collection).</li> </ul>

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<b>PR 3.3</b>	<p>Conduct an Air Quality Impact Assessment showing consideration against the local human population and any local protected ecological sites.</p> <p>The AQ Assessment should consider the following:</p> <ul style="list-style-type: none"> <li>Actual emission flow rates</li> <li>Existing ambient air quality in the local area</li> <li>Potential cumulative impacts from nearby industrial sources</li> <li>Diffuse/ fugitive emissions from plant operations in addition to channeled emissions from the plant's production chimneys.</li> <li>The level of mitigation guaranteed against each pollutant being assessed</li> </ul>	<ul style="list-style-type: none"> <li>Impacts on local human and ecological receptors.</li> <li>Regulated limits on air emissions</li> </ul>	EBRD PR3; Best Practise	<p>Samta</p> <p>EPS contractor</p> <p>Air Quality specialists</p>	CP	<ul style="list-style-type: none"> <li>An AQ Assessment report including:</li> <li>dispersion modelling from stack emissions,</li> <li>diffuse and fugitive emission predictions,</li> <li>clear identification of impacts on local human and ecological receptors, and</li> <li>appropriate mitigation measures.</li> </ul>
<b>PR 3.4</b>	<p>Develop an air quality monitoring plan as part of the ESMP for the site that records ambient air quality at off-site and on-site receptors.</p> <p>The monitoring system should be aligned with IED BAT 10 recommendations (<a href="#">Implementing decision - 2016/1032 - EN - EUR-Lex (europa.eu)</a>), and include baseline measurement of these parameters prior to Project operations.</p> <ul style="list-style-type: none"> <li>Include measure of TVOC, Cl &amp; HF, and Furans in baseline ambient air quality testing prior to operations.</li> <li>Include Dust (Al), TVOC (Al &amp; Cu), Cl &amp; HF (Al) and Furans (Al &amp; Cu) into stack emissions monitoring already proposed in</li> </ul>	<ul style="list-style-type: none"> <li>Impacts on local human and ecological receptors.</li> <li>Regulated limits on air emissions</li> </ul>	EBRD PR3; Best Practise	Samta	CP	<ul style="list-style-type: none"> <li>An air quality monitoring plan which aligns with the outcomes of the AQ Assessment and BAT recommendations.</li> </ul>

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OFFICIAL USE

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	<p>the ESIA, and consider continuous or periodic monitoring of channeled emissions (on a more frequent basis than once per year).</p> <ul style="list-style-type: none"> <li>• Include diffuse emissions and dust monitoring in the ESMP monitoring programme.</li> </ul>					
<b>PR 3.5</b>	<p>Consider implementing the following BATs into the design of the process flow and emissions treatment plant:</p> <ul style="list-style-type: none"> <li>• Copper - BATs 37, 40, 42, 43, 44, 46, 48 &amp; 49.</li> <li>• Aluminium – BATs 80, 81, 82, 83 &amp; 84.</li> </ul> <p>Consider implementing BAT recommendations for diffuse emissions into the design of the plants and the site structures and layout.</p> <ul style="list-style-type: none"> <li>• Copper - BATs 25, 26, 27, 30, 31, 32, 33, 34, 35 &amp; 36.</li> <li>• Aluminium – BATs 77, 78 &amp; 79.</li> </ul>	<ul style="list-style-type: none"> <li>• Impacts on local human and ecological receptors.</li> <li>• Regulated limits on air emissions</li> </ul>	EBRD PR3; BAT	Samta  EPS contractor	CP	<ul style="list-style-type: none"> <li>• Design report detailing the assessment, selection criteria and incorporation motivation of selected BATs into the final design.</li> <li>• All technically and financially feasible and cost-effective opportunities for air quality management will be identified and considered as part of the project design.</li> </ul>
<b>PR 3.6</b>	<p>Refine the Project water balance following detailed plant design. This should also account for calculated volumes of reusable water, including rainwater capture.</p>	<ul style="list-style-type: none"> <li>• Water efficiency</li> </ul>	Best Practice	Include in EPS scope	Prior to Const.	<ul style="list-style-type: none"> <li>• Revised water balance aligned with:</li> <li>• final plant designs</li> <li>• high level mass balance</li> <li>• inclusion of relevant BATs</li> <li>• all sources of water</li> </ul>

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<b>PR 3.7</b>	Define the water quality requirements for the processes and confirm these will be met by the treated domestic effluent. This could be supported by a high-level mass balance on aqueous streams that will inform on the suitability of the water for specific reuse.	<ul style="list-style-type: none"> <li>Contamination of soil and water resources</li> <li>Plant lifespan</li> </ul>	Best Practice	Include in EPS scope	Prior to Const.	<ul style="list-style-type: none"> <li>A high-level mass balance report detailing:</li> <li>Influent and effluent stream characterisation and load</li> <li>Associated treatment technologies</li> <li>Minimum requirements for reuse in processing plants</li> </ul>
<b>PR 3.8</b>	Including groundwater monitoring in the environmental monitoring programme during the whole life of the plant.	<ul style="list-style-type: none"> <li>Contamination of water resources</li> </ul>	EBRD PR3	Samta	Prior to Ops.	<ul style="list-style-type: none"> <li>Inclusion of groundwater monitoring locations, schedule and parameters in the ESMP.</li> </ul>
<b>PR 3.9</b>	Establish and maintain an operational GHG inventory for the Project	<ul style="list-style-type: none"> <li>Climate Change and GHG emission</li> </ul>	Best Practice	Samta	Prior to CSU and ongoing	<ul style="list-style-type: none"> <li>GHG inventory based on accepted calculation methodologies eg. GHG Protocol.</li> </ul>

PR4: HEALTH, SAFETY AND SECURITY

<b>PR 4.1</b>	<p>Carry out more detailed risk assessments in developing the Project-level H&amp;S policies and procedures, and ensure the following:</p> <ul style="list-style-type: none"> <li>Identification of specific risks associated with certain work activities that could result in adverse effects on the health, safety and well-being of workers with sensitivities such as age, gender, disability or short or long-term health conditions.</li> <li>Measures to identify and prevent accidents, injury and ill-health to workers and project-affected communities arising from or</li> </ul>	<ul style="list-style-type: none"> <li>Occupational H&amp;S</li> <li>Community H&amp;S</li> </ul>	Legal; EBRD PR4; Best Practice	Samta HSSEC	Prior to CSU	<ul style="list-style-type: none"> <li>Project-level Occupational and Community H&amp;S Risk Assessments</li> <li>Project-level Occupational and Community H&amp;S Management Plans.</li> <li>Project-level Occupational and Community H&amp;S Monitoring Programmes, including, but not limited to an air quality monitoring plan which aligns with the outcomes of the AQ</li> </ul>
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	<p>associated with carrying out of project activities.</p> <ul style="list-style-type: none"> <li>Preventive and protective measures and plans to manage health and safety risks in accordance with the hierarchy of risk control and in accordance with good international practice.</li> <li>Providing workers and project-affected communities with relevant information, instruction, and training relating to health and safety hazards, risks, protective and preventive measures and emergency arrangements that are necessary for their health and safety throughout the project.</li> <li>Assessment of project-related gender-based violence risks of sexual harassment, sexual exploitation and abuse to project-affected persons and communities. Where appropriate, the client will adopt specific measures to prevent and address these risks, including the provision of confidential channels for reporting incidents and providing support.</li> <li>Monitoring of both leading and lagging indicators, ambient conditions, and environmental emissions which could pose a health and safety risk to workers or surrounding communities.</li> </ul> <p>The above to include developing an ongoing air quality monitoring program as part of the ESMP for the site comprising on-site monitors. The results of the monitoring program should be checked regularly against the air quality standards for industrial receptors to ensure that</p>					Assessment and BAT recommendations.

## OFFICIAL USE

OFFICIAL USE

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	ambient air quality remains below the relevant health thresholds.					
<b>PR 4.2</b>	Building to be designed according to the concept of universal access, including safeguards determined through H&S risk assessment.	<ul style="list-style-type: none"> <li>Occupational H&amp;S</li> </ul>	Legal; EBRD PR4; Best Practice	EPS Contractor	Prior to Const.	<ul style="list-style-type: none"> <li>Sign off by suitably qualified structural engineer and H&amp;S specialist confirming building design is in accordance with the concept of universal access, and includes safeguards determined through H&amp;S risk assessment.</li> </ul>
<b>PR 4.3</b>	Include requirement for construction products and equipment to be CE marked in contractor agreements.	<ul style="list-style-type: none"> <li>Occupational H&amp;S</li> </ul>	Best Practice	EPS Contractor	Prior to Const.	<ul style="list-style-type: none"> <li>Contractor agreement and associated checklist of construction products and equipment.</li> </ul>
<b>PR 4.4</b>	Project to have a procedure in place to review supplier and logistics contractor emergency preparedness and response plans with respect to spill management during delivery.	<ul style="list-style-type: none"> <li>Occupational H&amp;S</li> <li>Community H&amp;S</li> </ul>	Legal; EBRD PR4; Best Practice	Samta	Prior to CSU	<ul style="list-style-type: none"> <li>Clause in supplier and logistics contractor agreements covering requirement for emergency preparedness and response plans with respect to spill management during delivery.</li> </ul>
<b>PR 4.5</b>	Ensure EU Classification Labelling and Packaging (CLP) regulations are followed	<ul style="list-style-type: none"> <li>Occupational H&amp;S</li> <li>Community H&amp;S</li> </ul>	EBRD PR4	Samta	Prior to CSU	<ul style="list-style-type: none"> <li>Hazardous substances and materials handling and storage procedures covering:</li> <li>inventory and safety data sheets,</li> <li>appropriate storage,</li> <li>safe handling, and</li> <li>spill and accidental contact.</li> </ul>
<b>PR 4.6</b>	Develop and implement a traffic and road safety plan with associated procedures covering:	<ul style="list-style-type: none"> <li>Occupational H&amp;S</li> </ul>	Best Practice	Samta	Prior to Const.	<ul style="list-style-type: none"> <li>Traffic and road safety plan with associated procedures.</li> </ul>

OFFICIAL USE

OFFICIAL USE

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	<ul style="list-style-type: none"> <li>Journey management,</li> <li>Driving practices,</li> <li>Road conditions,</li> <li>Community risk,</li> <li>Vehicle selection, and</li> <li>Driver training.</li> </ul>	<ul style="list-style-type: none"> <li>Community H&amp;S</li> </ul>				
<b>PR 4.7</b>	Undertake suitable and sufficient risk assessments to determine the prevention and/or mitigation measures to avoid and/or minimise risks caused by natural hazards or land-use changes.	<ul style="list-style-type: none"> <li>Occupational H&amp;S</li> <li>Community H&amp;S</li> </ul>	EBRD PR4; Best Practice	Samta	Prior to CSU	<ul style="list-style-type: none"> <li>Natural hazard risk assessment and associated procedures.</li> </ul>
<b>PR 4.8</b>	Incorporate company responsibilities into disease prevention programme.	<ul style="list-style-type: none"> <li>Occupational H&amp;S</li> </ul>	EBRD PR4; Best Practice	Samta	Prior to Ops	<ul style="list-style-type: none"> <li>Revised disease prevention programme, including cleaning regimes, pest management, communication to staff, food hygiene, etc. as applicable.</li> </ul>
<b>PR 4.9</b>	Ensure that emergency preparedness and response planning is in line with Project risks and management measures are comprehensive.	<ul style="list-style-type: none"> <li>Occupational H&amp;S</li> <li>Community H&amp;S</li> </ul>	Legal; EBRD PR4	EPS Contractor	Prior to Const.	<ul style="list-style-type: none"> <li>Emergency preparedness and response plan aligned with outcome of risk assessment, and detailing the Who, What, When, Where and How of emergency management.</li> </ul>
<b>PR 4.10</b>	Review the Human Rights Management Plan's so that all Contractor requirements are clear and in line with EBRD PR 4.	<ul style="list-style-type: none"> <li>Contractor risk management</li> </ul>	EBRD PR4	Samta	Prior to Const.	<ul style="list-style-type: none"> <li>Revised HRRRA which includes risks and associated roles and responsibilities of contractors covering the relevant H&amp;S and security requirements of PR4.</li> </ul>
<b>PR 4.11</b>	Set-up the procedure requiring alignment with VPSHR before contracting security providers and develop an MoU template in line with the VPSHR.	<ul style="list-style-type: none"> <li>Contractor risk management</li> <li>Security risk</li> </ul>	Best Practice	Samta	Prior to security on-boarding	<ul style="list-style-type: none"> <li>Security contractor agreement stipulating VPSHR requirements, and proof that</li> </ul>

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No.	Action	E&S Risks (Liability/Benefits)	Requirement (Legal, EBRD PR, Best Practice)	Resources, Investment needs, Responsibility	Timetable	Target & Evaluation Criteria for Successful Implementation
						security staff have received the related training.
<b>PR 4.12</b>	Develop and implement a cybersecurity programme, ensuring that contractors and other system users have adequate knowledge of the programme and that suitable restrictions are in place.	<ul style="list-style-type: none"> <li>Information security</li> </ul>	Best Practice	Samta	Prior to contractor on-boarding	<ul style="list-style-type: none"> <li>Cybersecurity programme detailing the measures to protect sensitive and private information.</li> </ul>

PR6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

<b>PR 6.1</b>	Revise the Project's Aol on biodiversity once air quality modelling has been completed.	<ul style="list-style-type: none"> <li>Impacts on biodiversity receptors.</li> <li>Informing adaptive management of biodiversity risks</li> </ul>	EBRD; Best Practice	Samta  Biodiversity specialists	Prior to constr.	<ul style="list-style-type: none"> <li>Technical / summary note confirming or adjusting the ESIA reflection of the potential impacts of the Project for biodiversity receptors, which includes a revised project Aol and assessment of air quality impacts, particularly on surrounding Protected Areas.</li> </ul>
<b>PR 6.2</b>	Assess impacts on nearby Protected Areas (e.g. Merja Bokka) once air quality modelling has been completed.	<ul style="list-style-type: none"> <li>Impacts on biodiversity receptors.</li> <li>Informing adaptive management of biodiversity risks</li> </ul>	EBRD; Best Practice	Samta  Biodiversity specialists	Prior to contr.	

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PR8: CULTURAL HERITAGE

PR 8.1	Develop and adopt a chance finds procedure to ensure that any finds are treated in accordance with Moroccan and international best practice requirements.	<ul style="list-style-type: none"> <li>Loss of heritage artefacts.</li> </ul>	Legal; EBRD PR8	Samta  EPS contractor	Prior to Const.	<ul style="list-style-type: none"> <li>Chance finds procedure adopted by Samta and Contractors, and communication to construction contractors confirming adoption and training.</li> </ul>
PR 8.2	Conduct a screening study to formally determine if a cultural heritage baseline study is necessary. (If a baseline study is necessary, the ESAP should be updated to include this and the outcomes)			Samta  With academically qualified cultural heritage specialist	Prior to Const.	<ul style="list-style-type: none"> <li>Screening report produced by an academically qualified cultural heritage specialist motivating and detailing whether or not further investigations are necessary.</li> </ul>

PR10: INFORMATION DISCLOSURE AND STAKEHOLDER ENGAGEMENT

PR 10.1	<p>Implement the Stakeholder Engagement Plan (SEP) for the Project which includes:</p> <ul style="list-style-type: none"> <li>Stakeholder identification and mapping,</li> <li>Communication protocols,</li> <li>Disclosure of information,</li> <li>Reporting on E&amp;S performance,</li> <li>Incident reporting,</li> <li>Change management, and</li> <li>Clear roles, responsibilities</li> </ul> <p>Update the SEP when necessary.</p>	<ul style="list-style-type: none"> <li>Legal compliance</li> <li>Loan agreement compliance</li> <li>Reputational risk</li> <li>Duty of care</li> </ul>	Legal; EBRD 10	Samta  With framework assistance by Lender E&S Consultant	<p>Prior to Const.</p> <p>Continuous updates</p>	<ul style="list-style-type: none"> <li>Completed stakeholder engagement plan as per EBRD framework requirements, including populated details of stakeholders and procedures.</li> <li>Disclosure of ESIA on Samta website, and hardcopies available on request.</li> </ul>
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