

Environmental and Social Action Plan (ESAP) for Kemin Balykchy OHTL (July 2025)

Environmental and Social Action Plan (rev 1.0 Issued for disclosure)

Abbreviations

| Acronym | Definition |
|----------------|---|
| CESMP | Construction Environmental and Social Management Plan |
| CFs | Chance Finds |
| CH | Cultural Heritage |
| CHMP | Cultural Heritage Management Plan |
| E&S | Environmental and Social |
| EBRD | European Bank for Reconstruction and Development |
| EIA | Environmental Impact Assessment |
| EHS | Environment, Health and Safety |
| EP | Environmental Permit |
| EPC | EPC (Contractor) Engineering, procurement, and construction (Contractor) |
| ESAP | Environmental and Social Action Plan |
| ESIA | Environmental and Social Impact Assessment |
| ESMP | Environmental and Social Management Plan (prepared as part of the ESIA process) |
| ESMS | Environmental and Social Management System |
| HR | Human resources |
| IESC | Independent Environmental and Social Consultant |
| IFC | International Finance Corporation |
| ISO | International Standards Organization |
| KPIs | Key Performance Indicators |
| LARF | Land acquisition and resettlement framework |
| LRP | Livelihood restoration Plan |
| MOM | Minutes of Meetings |
| NEGK | P.J.S.C NEGK (Owner) |
| OHS | Occupational Health and Safety |
| OESMP | Operation Environmental and Social Management Plan |
| PIT | Project Implementation Team (NEGK) |
| PR | Performance Requirements |
| PZP | Protection Zone Plan |
| SE | Stakeholder engagement |
| SEP | Stakeholder Engagement Plan |

Environmental and Social Action Plan (ESAP) for Kemin Balykchy OHTL (July 2025)

Table 1: ESAP, version 1, IFD, July 2025

| No. | Action required | Environmental and social risks (liability/benefits) | Requirements (legislative, EBRD PR,GIP) | Resources, investment needs, responsibility | Timeframe | Target and criteria for implementation | evaluation for successful |
|---|--|--|---|--|--------------------------------------|--|---------------------------|
| 1 Assessment and Management of Environmental and Social Impacts and Issues | | | | | | | |
| 1.1 | Obtain positive conclusion for OHTL, substation and access roads construction work. | Compliance with national legislation Approved EIA | EBRD PR1 National Law and Regulation | NEGK PIT / Juru Ltd (National Pre-EIA) | Prior to financial close (July 2025) | Positive Conclusion (Stage 1 / 2) | |
| 1.2 | Obtain Positive Conclusion of SEE for the national EIA report (Stage III) (operation) | Compliance with national legislation Approved EIA | EBRD PR1 National Law and Regulation | NEGK PIT | 45 days prior to start of operation | Positive Conclusion (s) of SEE for the national EIA report (Stage 3) | |
| 1.3 | Perform supply chain due diligence/obtain the third-party supply chain due diligence reports to verify suitability of potential suppliers' (of transformers). | Elimination of forced labour child labour or occupational health and safety failures in supply chain | EBRD PR 1 (para 21) | NEGK | Pre-financial close | Supplier DD (transformers) | |
| 1.4 | Develop a Kemin-Balykchy EPC Contract E&S Schedule defining E&S obligations including the following specific requirements of the ESIA: i) Prohibit the use of ACMs, PCPs, lead-based paints, Pesticides, and herbicides defined under the Stockholm Convention.) Areas such as compounds that may require additional security measures | Regulatory and Lender compliance | Kyrgyzstan Standards and EBRD ESP | NEGK PIT (own resources, external consultants) | 30 June 2025 (Balykchy SS works) | E&S Schedule part of EPC Contract. | |

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| | such as lighting, or closed-circuit television. | | | | | |
| 1.5 | Provide the following documentation for the preferred EPC Contractor: <ul style="list-style-type: none"> • ISO 14001 certified environmental management system or equivalent. • ISO 45001 or equivalent certified health and safety management system. • Publicly disclosed Health and Safety Policy Statement. • Publicly disclosed Environmental Policy Statement • Statements relating to any H&S convictions, reportable incidents or environmental breaches. • Information on supplier qualification related to labour (forced labour, child labour, occupational health and safety and biodiversity Experience implementing requirements of E&S Policy on projects. | EPC Contractor has the experience and certifications to adequately undertake the Project to national and international standards. | EBRD PR1 GIP National Law and Regulation | EPC Contractor | Pre-financial close | Documents reviewed and approved by Lender's advisor. |
| 1.6 | Assign a dedicated person to oversee E&S obligations of this Environmental and Social Action Plan (ESAP) | Adequate E&S oversight for the construction and operation phase | EBRD PR1 | NEGK PIT | Financial Close | CV of the nominated person NEGK organogram |

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| 1.7 | Develop a project-level Environmental and Social Management System (ESMS) (aligned with ISO14001 and ISO45001) to oversee construction phase works, including: <ul style="list-style-type: none"> • E&S Policy • C-ESMP • O-ESMP • Organogram and definition of roles and responsibility for E&S management • Inspections and audits schedule • Monitoring • Reporting • Document Control • Management Review | Optimisation of E&S oversight through a formalised system | EBRD PR1 Aligned to ISO14001:2015 (or equivalent certified integrated management systems) | NEGK PIT | 60 days before mobilisation for site clearance works | ESMS Manual C-ESMP O-ESMP (NB – CESMP and OESMP contracted to Juru to prepare) |
| 1.8 | Establish construction phase ESMS for implementing the requirements of the ESIA, ESMP and C-ESMP. | E&S management through a formalised system | EBRD PR1 Aligned to ISO14001:2015 and & ISO 45000 (or equivalent certified integrated management systems) | EPC Contractor | 60 days before Site mobilisation | E&S Policy, ESMS manual (supporting policies and management plans) |
| 1.9 | Appoint following positions in NEGK PIT: <ul style="list-style-type: none"> i) E&S Safeguard specialist ii) CLO | Ensure implementation of E&S management plans | EBRD PR 1 (para 21) | NEGK PIT | 60 days before Site mobilisation | Organogram CV for the designated person(s) Evidence of appointment (contract) |
| 1.10 | Appoint site E&S team with relevant qualifications, defined roles and responsibilities, and authority. | Ensure implementation of | EBRD PR 1 (para 21) | EPC Contractor | 30 days before site mobilisation | Organogram Terms of reference/job descriptions for key roles |

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| | <ul style="list-style-type: none"> One (1) EPC Contractor E&S Manager Two (2) Senior EPC Contractor HSE Managers (or separate H&S Manager and Environmental Manager), One (1) EPC Contractor HR Manager, One (1) EPC Contractor social officer (CLO, accommodation, GBVH etc.) One (1) EPC Contractor HSE Officer for every 50 workers | E&S management plans | | | | CV for the designated person(s) Evidence of appointment (contract) |
| 1.1 1 | Provide evidence that ESIA, ESMP, CESMP have been shared with all subcontractors in a contractual mechanism | Minimise E&S impacts for the Project subcontractors | ESIA, ESMP EBRD PR1 EBRD PR2 | EPC Contractor | 60 days before Site mobilisation | Subcontractor E&S contract schedule |
| 1.1 2 | Perform Construction Monitoring audits of construction activities by Environmental, Health and Safety, Social and including a labour audit against national and international requirements. | Non-compliance with ESIA, ESMP, national requirements. | Good Practice EBRD: PRs Regulations Environmental Regulations Environmental Consent | Independent Environmental & Social Consultant (IESC) on behalf of NEGK, | i) Quarterly during Construction ii) Annually for first 2 years of operation | i) IESC Quarterly Audit reports ii) IESC Annual Audit reports |
| 1.1 3 | Develop a permit tracking register to outline all necessary temporary licenses, consents and permits including timing for renewal and summary of conditions. | Ensure implementation of national E&S obligations | EBRD PR 1 (para 21) Environmental and Social Laws of Kyrgyz Republic | EPC Contractor | 30 days before site mobilisation | Permit and Conditions register |
| 2.0 | Labor and Working Conditions | | | | | |

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| 2.1 | Provide documentation forming Contractor Human Resource (HR) Policy addressing: <ul style="list-style-type: none"> Working conditions (inc. overtime) Terms of employment Informing workers about their rights Prohibition of Child Labor and Forced labor Equal opportunities/ non-discrimination Right to form Worker's organisations etc. Worker grievances | Ensure working terms and conditions meet Project standards and national laws. | EBRD PR2 Labor Code of Kyrgyz Republic | EPC Contractor | i) 60 days before site mobilisation | HR Policy Labor Management Plan Worker grievance mechanism |
| 2.2 | Develop Labour Management Plan and disclose to all subcontractors | In adequate transfer of obligations to subcontractors | EBRD PR2 Labor Code of Kyrgyz Republic | EPC Contractor | 60 days before Site mobilisation | Appended to subcontractor contracts |
| 2.3 | Identify all villages within 15 km of the Project ROW for local hiring and disclose the Local Employment and Procurement Protocol. | Maximise local employment opportunities and gender balance in the workforce. | EBRD PR2 ILO core conventions Labor Code | EPC Contractor | 60 days before Site mobilisation | Evidence of employment meetings in local communities. |
| 2.4 | Develop Local Employment and Procurement Protocol. (Promote good practices concerning gender and equal opportunities in the Contractors' workforce) | Maximise local employment opportunities and gender balance in the workforce. | EBRD PR2 ILO core conventions Labor Code | EPC Contractor | 60 days before Site mobilisation | Local Employment and Procurement Procedure accepted by Lenders Advisor. |

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| 2.5 | Develop a Project Code of Conduct for signature by all employees, contractors, and sub-contractors as part of the EPC ESMS. This should include conduct requirements related to GBVH. | Ensure adequate workforce management per EBRD requirements and the Law of the Republic of Kyrgyzstan. | EBRD PR2 ILO core conventions Labor Code | EPC Contractor | 60 days before Site mobilisation | Project Labor Code of Conduct accepted by Lenders Advisor. |
| 2.6 | i) Develop a Worker Grievance Mechanism (WGM) for permanent and subcontracted employees as part of the EPC ESMS. ii) Disclose WGM to workers on OHTL, substation (Kemin and Balykchy) and access roads (in appropriate language(s)). | Improved employee/subcontractor relationship and management | EBRD PR2 | EPC Contractor | i) 60 days before site mobilisation ii) First construction monitoring visit | i) Documented WGM and WGM Log and Grievance Form accepted by Lender's advisor ii) Evidence of disclosure around site / training |
| 3 | Resource Efficiency and Pollution Prevention and Control | | | | | |
| 3.1 | Develop a Project Construction Waste Management Plan (WMP). . | Ensure wastes are managed following ESIA requirements and GIP (for hazardous waste disposal) | ESIA, ESMP National Law EBRD PR3 Basel Convention | EPC Contractor (own budget and resources). Balykchy SS contractor (own budget and resources) | 60 days before Site mobilisation | Documented WMP accepted by Lender's advisor |
| 3.2 | i) Conduct a duty of care audit on the proposed general waste, recycling, construction waste, and hazardous waste disposal facilities in Kyrgyzstan to verify compliance with GIP. | Ensure wastes are managed following ESIA requirements and GIP (for hazardous waste disposal) | EBRD PR3 | EPC Contractor | 60 days before Site mobilisation | i) Waste facility audit report. ii) Waste Management Plan stating approved disposal locations, approved for use by the Lenders |

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| | ii) Disposal of solid waste will be at the closest sanitary landfill to the project site that aligns with GIP. The minimum criteria that define a sanitary landfill are identified in the ESMP. If any of the requirements are not met, the disposal facility will not be used for the purpose of disposal of solid waste for the project and the next closest sanitary landfill will be identified. | | | | | |
| 3.3 | Prepare Vegetation Clearance and Rehabilitation Plan (temporarily cleared areas) | Soil erosion and sediment run-off. | EBRD PR3 | EPC Contractor | 60 days before Site mobilisation | Documented WMP accepted by Lender's advisor |
| 3.4 | Prepare an Environmental Management Plan (air, noise, waste dust, water use, water run off) | Community nuisance and contamination of nearby receptors (water, ecological) | EBRD PR3 | EPC Contractor | 60 days before Site mobilisation | Documented WMP accepted by Lender's advisor |
| 4 | Health, Safety and Security | | | | | |
| 4.1 | Establish a Construction Health and Safety Management System (HSMS) aligned with ISO45001 as defined in ESMP | Increased health and safety performance during construction of the OHTL and substation works. Minimise OHS accidents and incidents. | ESIA, ESMP National Occupational Health and Safety Law EBRD PR4 GIP | EPC Contractor | 60 days before Site mobilisation | HS Policy is signed by leadership. HS Management Plan and supporting tools (reporting procedure, forms etc.) |
| 4.2 | Prepare a Transportation Management Plan (TMP). | Reduce risks to community members and | ESIA, ESMP, CESMP, EBRD PR4, GIP | EPC Contractor | 60 days before Site mobilisation | TMP reviewed and accepted by Lenders |

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| | | workers related to transportation of components and workers to construction camp and Workfront's | | | | |
| 4.3 | Conduct a route survey for the delivery of transformers (abnormal load) and include any specific requirements in the Abnormal Loads Transportation Method Statement. | Reduce risks to community members and workers related to transportation. | ESIA, ESMP EBRD PR4 | EPC Contractor | 60 days prior to delivery of transformers | Delivery route assessment (transformers) Transformer delivery risk assessment and method statement. |
| 4.4 | Prepare a Project Emergency Preparedness and Response Plan (EPRP). To include specific information on dealing with landslides, evacuation of injured personnel, drills and training requirements. | Protection of workforce and communities in the case of an emergency. | ESIA EBRD PR4 | EPC Contractor | 60 days before Site mobilisation | EPRP reviewed and accepted by Lenders |
| 4.5 | Develop a Project Security Management Plan (SMP) including security guard code of conduct. | Reduced security risks / keep the facilities secure. | EBRD PR2 EBRD PR 4 | EPC Contractor | 60 days before Site mobilisation | Security Management Plan reviewed and accepted by Lenders |
| 4.6 | Prepare a Social Management Plan (SoMP) including a) Housing availability analysis b) list of approved housing c) Accommodation inspection checklist and audit schedule d) worker and GBVH code of conduct e) communication plan (between EPC and NEGK), d) tourism notifications as per ESIA. | Reduced risk to community from worker influx and on worker welfare from inadequate accommodation. | EBRD PR2 EBRD PR 4 IFC/EBRD Workers' Accommodation: Processes and Standards (2009) | NEGK PIT | 60 days before Site mobilisation | Social Management Plan reviewed and accepted by Lenders |

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| 5 | Land Acquisition, Involuntary Resettlement and Economic Displacement | | | | | |
| 5.1 | Prepare a Livelihood Restoration Plan (LRP) or update the Land Acquisition and Livelihood Restoration Framework (LARF once all designs and funding requirements are completed | Livelihood impacts to land users and owners | ESIA, LRP/LARF National Land Law EBRD PR5 | NEGK PIT (supported by a specialist third party) (own resources, external consultants) | Prior to start of works | LRP/updated LARF reviewed and accepted by the Lenders Advisor |
| 5.2 | Include review the following information as part of the LRP preparation or updated LARF: i) Confirm with herders if there is sufficient area to graze their animals away from the Project construction works. ii) Confirm that construction will not restrict access to grazing areas. iii) Confirm any possible employment impacts to herder employees. iv) Confirm potential livelihood impacts to tourism companies and local businesses. | Land users have restricted access to land that may affect livelihoods | ESIA, LARF National Land Law EBRD PR5 | NEGK PIT (supported by a specialist third party) | 60 days before Site mobilisation | Updated LARF/LRP reviewed and accepted by the Lenders Advisor |
| 5.3 | Implement defined livelihood restoration for the OHTL following the updated LARF or LRP | Livelihood impacts to land users and owners | ESIA, LARF National Land Law EBRD PR5 | NEGK PIT (supported by a specialist third party) | 30 days before site mobilisation | LARP/LARF completion report reviewed and accepted by the Lenders Advisor` |
| 5.4 | Perform a road condition assessment (gravel road) before and following the “core construction period” to assess damage/dilapidation to road infrastructure that can be attributed to | Impact on Landowners | ESIA EBRD PR5 GIP | NEGK PIT (supported by a specialist third party) | 30 days before to start of construction 30 days after core construction phase is completed | Pre-construction road condition report. Post construction road condition report. |

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| | project construction. Repair damage as appropriate, i.e., “make good”. | | | | | Evidence of completed repairs (photographic evidence etc) |
| 6 | Biodiversity Conservation and Sustainable Management of Living Natural Resources | | | | | |
| 6.1 | Conduct bird mortality survey by an ornithologist to confirm the effectiveness of the installed mitigation measures. | Compliance with ESIA and Lender requirements | EBRD PR6 Kemin – Balykchy ESIA Kemin - Balykchy Biodiversity Management Plan (BMP) | PIT | Commence upon physical installation of transmission line and extend 1 year. | Survey Report (annual) |
| 6.2 | Design the following E&S specific requirements for birds into the overall design: i) Install Bird Flight Diverters in 4 sections identified as having elevated collision risk, totalling 8.722 km, as follows: a. Narrow sections (2) of gorges with potential nesting habitat and elevated flight traffic of eagles and vultures b. Chui River crossing, with potentially elevated flight traffic of waterbirds c. Portion of line in proximity to NABU wildlife rehabilitation | Compliance with ESIA | EBRD PR1 /PR6 Kemin – Balykchy ESIA Kemin - Balykchy Biodiversity Management Plan (BMP) | EPC Contractor overseen by PIT | 60 days before Site mobilisation | Design drawings and supporting specifications. |

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| | center, to avoid proximity to collision-prone rehabilitated birds near their release site ii) Adopt full tension stringing iii) Raptors safe towers a. electrified cables suspended below, rather than above support structures; b. ≥2m of insulators at each attachment point of a powerline to a support structure; c. ≥2m separation between electrified cables; d. jumper cables suspended below insulators/support structure | | | | | |
| 6.3 | Plants are at direct risk during the construction of OHTL towers and access roads are 6 species identified as PBF, 3 documented within the Project Area <ul style="list-style-type: none"> <i>Malus sieversii</i> (IUCN VU, Kyrgyz LC – 2 localities) | Impact on plant species that are national protected. | National regulation EBRD PR6 Kemin – Balykchy ESIA Kemin - Balykchy Biodiversity Management Plan (BMP) | EPC Contractor overseen by PIT | i) 60 days before Site mobilisation ii) Spring 2026 iii) 60 days before Site mobilisation | i) Pre-construction rare plant survey ii) Final access road design and laydown area (mapped against locations of sensitive plant species) |

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| | <ul style="list-style-type: none"> <i>Tulipa ostrowskiana</i> (IUCN NT, Kyrgyz VU – 12 localities) <i>Tulipa zenaidae</i> (IUCN VU, Kyrgyz VU – 1 locality) <p>i. Pre-construction plant survey of proposed tower locations in alpine steppe habitat only (Spring 2026) and mark as per protocol set out in the BMP.</p> <p>ii. Undertake micro-siting/routing of towers, access roads, and lay-down areas to avoid sites with threatened species to the extent possible</p> <p>iii. Where any direct impact is unavoidable, plant rescue/relocation in consultation with national authorities and as per regulation.</p> <p>iv. Topsoil removal and temporary storage next to the tower for re-instatement at the temporarily impacted areas.</p> | | | | iv) Ongoing through excavation phase | <p>iii) Nationally approved rescue/relocation plan.</p> <p>iv) Topsoil removal inspection report.</p> | |

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| 6.4 | i. Provide evidence of training to workers on requirements of the BMP | Protection of reptile PBF, Asian Frog (IUCN VU, Kyrgyz VU) | ESIA, ESMP EBRD PR6 Kemon0Balykchy Biodiversity Management Plan (BMP) | EPC Contractor overseen by NEGK PIT | i) 60 days before Site mobilisation ii) Ongoing to workers | i) Induction slides and Asian frog toolbox talk attendance records |
| 6.5 | i. Confirm all towers in upland areas, at least 25m from all riverbanks or 25m from riparian vegetation (already expected and embedded into current design) ii. Confirm on site that: a. All pollution equipment e.g., generators, hazardous material storage) to be sited more than 50 m from riverbanks or riparian vegetation b. During construction, avoid disturbance or any deposition of sediments or pollutants into rivers | Protection of PBF fish species | ESIA, ESMP EBRD PR6 Kemin – Balykchy ESIA Kemin - Balykchy Biodiversity Management Plan (BMP) | EPC Contractor overseen by NEGK PIT | i) 60 days before Site mobilisation ii) Ongoing to workers | i) Final tower design drawings ii) Evidence of temporary equipment siting. iii) Induction slides regarding working near rivers and protection against pollution. iv) Work front inspection records v) Incident report |
| 6.6 | i) Conduct pre-construction survey for nesting PBF raptors and vultures within 1 km of the OHTL within the central portion of the OHTL containing potential nesting habitat. | Protection of PBF raptors and vultures | ESIA, ESMP EBRD PR6 Kemin – Balykchy ESIA Kemin - Balykchy | EPC Contractor overseen by NEGK PIT | i) 60 days before Site mobilisation | i) Pre-construction survey report ii) Map showing project design versus active nests (as per point i above) and tower |

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| | ii) Micro-siting of pylons and access roads to avoid any areas within 500 m of an active nest of a PBF bird species, if possible. If it is not possible, then avoid below ground work and tower erection at towers located within 500m of such nests between March and May | | Biodiversity Management Plan (BMP) | | | construction schedule |
| 7 | Cultural Heritage | | | | | |
| 7.1 | <p>Develop a Protection Zone Plan (hereinafter – PZP) incorporating the following protections applicable during the construction works:</p> <ul style="list-style-type: none"> For sites within the 0–50 m buffer, the PZP must be developed by a restoration architect - For sites within the 50–150 m buffer, the PZP must be developed by an accredited archaeologist. <p>The Protection Zone Plan is approved by the Ministry of Culture</p> | Protection of known cultural heritage | ESIA, ESMP EBRD PR1, 8 National Centre for Archaeology | EPC Contractor overseen by NEGK PIT | 60 days before Site mobilisation | <p>PZP including map showing construction zones or permanent infrastructure overlaid with CH features and a 50m buffer zone /150m buffer zone.</p> <p><i>(NB – PZP to act as the CH MP)</i></p> |
| 7.2 | If a 50m buffer cannot be maintained conduct a “Salvage Investigation” to determine whether construction works can proceed without excavation. If preservation of the site is not possible, | Protection of known cultural heritage | ESIA, ESMP EBRD PR1, 8 National Centre for Archaeology | EPC Contractor overseen by NEGK PIT | 30 days before work to impact cultural features. | Salvage investigation report reviewed and accepted by the Ministry of Culture, this study must also be reviewed by a commission formed under the |

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| | an Excavation and/or Relocation Plan for Archaeological Sites must be developed. | | | | | Academy of Sciences of Kyrgyzstan, Excavation and/or Relocation Plan (if required) approval from both the Ministry of Culture and the Academy of Science. |
| 7.3 | Prepare a project Chance Finds Procedure and watching brief as part of the EPC ESMS for all below-ground works, including overhead line transmission, substation, and access roads (both permanent and temporary). | Protection of unknown cultural heritage | ESIA, ESMP National legislation EBRD PR1, 8 | EPC Contractor accepted by NEGK PIT/ Lenders. | 60 days before Site mobilisation | Documented 'Chance Finds Procedure' reviewed and accepted by the Lenders Advisor |
| 7.4 | i. Include training on chance finds procedure in the Site Induction (induction and TBT) ii. Undertake training on chance finds (CFs) | Protection unknown cultural heritage | ESIA, ESMP National legislation EBRD PR1, 8 | EPC Contractor | 60 days before Site mobilisation | i) Training materials a) induction slides b) CF toolbox talk). ii) Induction and training records |
| 8 | Information Disclosure and Stakeholder Engagement | | | | | |
| 8.1 | Assign a Community Liaison Officer (CLO) to manage the delivery of the SEP | Maintain effective relationships with stakeholders (including land users) | EBRD PR10 EBRD PR5 | NEGK PIT | 60 days before Site mobilisation | CLO assigned for client |
| 8.2 | Nominate a community point of contact in the Contractor team (Contractor CLO) | Maintain effective relationships with stakeholders (including land users) | EBRD PR10 EBRD PR5 | EPC Contractor | 60 days before Site mobilisation | i)Contractor Organogram ii)CV of CLO |

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|-----|---|---|---|---|----------------------------------|---|
| 8.3 | Confirm Community Grievance Mechanism is fully established in the field as defined in the SEP. | Maintain effective relationships with stakeholders (including land users) | EBRD PR10, ESIA, SEP | NEGK PIT | 30 days before Site mobilisation | Grievance Form Grievance Log Grievance Boxes (in locations defined in SEP) |
| 8.4 | <p>Conduct pre-mobilisation engagement and awareness raising activities as per the SEP (alongside other requirements defined in the SEP). Specifically:</p> <ul style="list-style-type: none"> • Disclose Local Employment and Procurement Procedure with specific focus on disclosing to women and unemployed youth. • Display contact board at the perimeter of key work sites and at the entrance to the canyons stating contact details in the event of a complaint or comment. • Awareness-raising activities with local farmers, herders and community members to reduce exposure when grazing livestock in the ROW. • Disclosure of the community grievance mechanism. • Conduct safety campaign to improve people's knowledge of the traffic hazard on their roads, public information and other activities to address the issues, in particular along the EM11. | <p>Gain social license to operate</p> <p>Maintain effective relationships with stakeholders (including land users).</p> | EBRD PR10 EBRD PR5 | NEGK PIT | 30 days before Site mobilisation | <p>Record of engagement in SE Log</p> <p>Engagement MOM</p> <p>Photographs of information displayed around the Project area of influence.</p> |

Environmental and Social Action Plan (ESAP) for Kemin Balykchy OHTL (July 2025)

| No. | Action required | Environmental and social risks (liability/benefits) | Requirements (legislative, EBRD PR,GIP) | Resources, investment needs, responsibility | Timeframe | Target and evaluation criteria for successful implementation |
|-----|--|---|---|---|-------------------|--|
| | <ul style="list-style-type: none"> Post road safety notices in roadside cafés to inform road users of safe and defensive driving approaches. Post warning posters in roadside cafes to warn local of construction vehicles entering and exiting EM11 to the gravel roads (and using the gravel roads). | | | | | |
| 8.5 | Provide relevant community awareness training and information relating to EMF working under OHLs. | Maintain effective relationships with stakeholders (including land users) | ESIA, ESMP, SEP, EBRD PR10 | NEGK PIT (Costs associated with printing of any notification material (Leaflets, posters) | Pre-energisation. | Awareness leaflets and log of activities in SE Log. |