

DRAFT ENVIRONMENTAL AND SOCIAL ACTION PLAN

Introduction

- The outstanding actions to facilitate the Project compliance with the Applicable Standards are summarised in tabular format in the Draft E&S Action Plan (ESAP) presented in the table below. The ESAP include items that do not as yet fully meet the Project Standards, or for which there is currently insufficient information to assess compliance, and which should be resolved to the satisfaction of Financing Parties in a given timeframe.

Table Draft E&S Action Plan

ID	Corrective Action	Deliverable & Evaluation Criteria	Timeframe	Status
ERBD PR3; IFC PS3	Assessment and Management of Environmental and Social Risks and Impacts			
ES1	<p>The ESMS Framework shall be updated to include:</p> <ol style="list-style-type: none"> Define Project entities E&S roles and responsibilities and respective communication protocol Project Standards, specifying the environmental limits and standards, safety distances and other limitations as applicable (for construction and operation) Commitment Register which incorporates all management and monitoring measures performance indicators for construction and operations phases, to be used as a master document for E&S management and monitoring. Updated list of C-ESMPs and O-ESMPs as per ESAP requirements Training Plan with a list of all E&S and HSE trainings. Non-conformances register template Incident reporting and investigation procedure including template HSE and E&S Site audits/inspections checklists, including independent H&S and Labour Audits based on a ToR and agreed with the Lenders Existing corporate procedures for monitoring of contractors and primary suppliers Frequency and timing of internal monitoring and review Key Performance Indicators for ESMS compliance. 	ESMS and Commitment Register	<p>Prior to Signing</p> <p>Commitments register disclosed within 30 days after the start of ESIA disclosure</p>	In progress
ES2	<ol style="list-style-type: none"> Appoint Key E&S resources for construction Appoint all relevant E&S resources for construction Introduce condition to follow up-to-date Commitment Register into the EPC contract, in regards to required E&S resources and management plans 	Presence of E&S staff as defined in the ESMS	<ol style="list-style-type: none"> Prior to Signing In due course Prior to signing 	Open
ES3	Prepare and submit E&S Monitoring Reports (ESMRs) to the Lenders. The ESMR template shall be agreed with the Lenders and adapted as necessary as agreed with the Lenders.e.g. to reflect the transition from construction to operation		<ol style="list-style-type: none"> ESMR template agreed – prior to Financial Close ESMRs submitted during Project 	Open

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			life-cycle as defined in Financing Agreement	
ES4	<p>Appoint Independent E&S Consultant (IESC) for the pre-construction (post-signing and prior to commencement of mobilisation), construction period and at least the first three years of operations.</p> <p>The scope of the IESC will include the undertaking of monitoring every 4 months prior to, during construction and until construction completion, semi-annual monitoring during the first year two years of operations, and then annual monitoring thereafter, subject to Lenders' review.</p>	Appointment of IESC	Prior to Signing	Open
ES5	<p>Develop a Project-specific:</p> <ul style="list-style-type: none"> a. E&S Policy b. Project Community Relations Policy c. Human Resources Policy d. Human Rights Policy. 	Project Specific E&S Policy	Prior to Signing	Open
ES6	<p>Update the Environmental and Social Impact Assessment (ESIA) to address IESC and Lender comments to ensure comprehensive alignment with national EIA and applicable international requirements, including detailed assessments of impacts from construction and operational activities in respect to environmental, physical and biodiversity impacts, environmental limits and thresholds, unplanned events, socio-economic effects on vulnerable groups and community health and safety risks, while providing robust mitigation measures and documenting all stages of the assessment.</p> <p>Update the Non-Technical Summary (NTS) in line with the updated ESIA and including outcomes from disclosure activities.</p>	Updated ESIA, NTS and EIA studies Disclosure of Final ESIA and NTS in English and subsequently Russian and Kazakh versions as originally disclosed	<p>15 days after the end of ESIA disclosure (English versions of updated ESIA and NTS)</p> <p>30 days after the end of ESIA disclosure (language versions of updated ESIA and NTS)</p>	In progress
ES7	Develop an integrated construction schedule clearly incorporating all E&S pre-construction activities (including as outlined in this ESMP for PS/PR5 and 6)	Integrated construction schedule supported by the constraints map	Prior to Signing	Open

ID	Corrective Action	Deliverable & Evaluation Criteria	Timeframe	Status
	<p>The schedule must demonstrate an ensured compatibility of construction activities with all prerequisite surveys and mitigation measures completed prior to construction in any given area.</p> <p>Schedule to be supported by spatial mapping of constraints on the Project footprint.</p> <p>A land entry process must be developed to ensure that there is an appropriate governance process for the EPC to be given permission by the Company to enter specific areas to start construction only after completion of all necessary E&S activities.</p>	Land Entry Process	Prior to land entry	Open
ES8	<p>Update the Management of Change procedure to include:</p> <ol style="list-style-type: none"> E&S Screening and assessment checklists Detailed E&S criteria for classification (Class III, Class II or Class I) of changes. Assessments/studies approvals procedure ESMP updates procedure Changes communications procedure 	Management of Change procedure	Prior to Signing	Open
ES9	Develop a permitting register for main Project components and ancillary facilities including the timeline and maintain through the Project implementation.	Permitting register	Prior to Signing	Open
ES10	Provide information on the status of climate change risk adaptation measures relevant to the Project design (included or not), either in the CCRA or in a separate technical note.	Updated CCRA	30 days after the start of ESIA disclosure	Open
ES11	<p>Update the HRRA to inform the ESIA update (refer to ES4), to include:</p> <ul style="list-style-type: none"> Assessment of supply chain risks Description of mitigation measures for supply chain risks Monitoring commitments for Corrective Action Plans developed for project suppliers (WTG and BESS). 	Updated HRRA	Prior to Signing	Open
ES12	<p>Update topic specific C-ESMPs to:</p> <ul style="list-style-type: none"> Include ESIA updates and additional mitigation and monitoring requirements Convert high-level commitments into specific, actionable mitigation measures for EPC implementation on site. 	C-ESMP: topic specific management plans	Prior to Financial Close or 3 months prior to start of construction whichever is sooner	Open

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	<ul style="list-style-type: none"> • Link mitigations to emissions limits, consumption thresholds, safety distances, environmental quality monitoring parameters. • Define monitoring target and KPIs aligned with the ESMS framework. <p>Develop full set of topic specific C-ESMP as per ESDD comments:</p> <ul style="list-style-type: none"> • Waste Management Plan • Hazardous Materials Management Plan • Water Management Plan • Air Emissions Management Plan • Noise Management Plan (if required by ESIA update) • Resource Efficiency Management Plan • Soil Management Plan • Emergency Preparedness and Response Plan (EPRP) • Blasting Management Plan (no framework plan received) • Biodiversity Management Plan (BMP) (refer to PS6 for details) • Rare Species Management Plan • Invasive Species Management Plan • Archaeological and Cultural Heritage Management Plan and Chance Finding Procedure • Influx Management Plan • Site Security management plan • Labor Management Plan • Accommodation Management Plan • Community Health and Safety & Security Management Plan • Occupational Health and Safety Management Plan • Traffic Management Plan • Supply-chain Management Plan (no framework plan received) • Livelihood Restoration Plan (refer to PS5 for details) 		Rare Species Management Plan Prior to Signing	

ID	Corrective Action	Deliverable & Evaluation Criteria	Timeframe	Status
ES13	Develop full set of topic specific O-ESMP: <ul style="list-style-type: none"> • Waste Management Plan • Hazardous Materials Management Plan • Resource Efficiency Management Plan • Emergency Preparedness and Response Plan (EPRP) • Radiological Management Plan (if triggered) • Biodiversity Management Plan (BMP) • Invasive Species Management Plan • Archaeological and Cultural Heritage Management Plan and Chance Finding Procedure • Labour Management Plan • Communicable Disease Outbreak Management Plan/ Hygiene Management Plan • Community Health and Safety & Security Management Plan • Occupational Health and Safety Management Plan • Traffic Management Plan • Supply-chain Management Plan 	O-ESMP: topic specific management plans	6 months prior to operations	Open
ES14	a) Update the Stakeholder Engagement Plan (SEP) to include contact information of Community Liaison Officer (CLO), tailored engagement strategies with all vulnerable groups, monitoring KPIs, and document all previous engagements. Ensure structured engagement with village elders, communities and media, including before higher-risk activities. b) As part of stakeholder engagement, regularly report Project ESAP progress to the communities and establish a structured approach to integrate stakeholder input into decision-making.	a) Updated SEP b) Include respective provisions in the ESMR Template	a) Prior to Financial Close b) ESMR Template	Open
ES15	a) Disclose Public Consultations Report (PCR) which documents the disclosure and consultation activities with reference to the SEP, the feedback received and how this has or will be considered by the Project or the reasons which it has not	a) Proof of disclosure of PCR	Final PCR disclosed - Prior to Signing	Open

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ES16	<p>a) Update the Project-level External Grievance Mechanism with:</p> <ul style="list-style-type: none"> Details on how inclusivity and accessibility measures will apply to the grievance mechanism. Details on multiple channels for grievance submission (in-person, phone, email); Commitment for periodic review of GM effectiveness and reporting to lenders. <p>b) As part of grievance mechanism implementation:</p> <ul style="list-style-type: none"> Ensure all grievances, including those from the Scoping and ESIA consultation, are documented in a grievance log. Verify and ensure the GM is accessible to vulnerable groups and presented in both Kazakh and Russian. <p>Install grievance boxes in all affected communities, including Shyganak, Sholpan, Ulken, Kenes, and Khantau villages.</p>	<p>a) Updated Project-level External Grievance Mechanism</p> <p>b) Grievance logs and photographic evidence</p>	<p>a) Prior to Signing</p> <p>b) Throughout the ESIA disclosure period</p>	Open
EBRD PR2; IFC PS2	Labour and Working Conditions			
LW1	Develop Project-specific construction Accommodation Camp Management Plan inclusive of accommodation facilities conditions' description and accommodation monitoring checklist.	Project-specific Accommodation Camp Management Plan,	Prior to Signing	Open
LW2	<p>a) Develop human resources policies and procedures and other documents identified in the ESIA and LMP (as per Table 2) to reflect on potential labour risks and impacts, inclusive of commitments stipulated by the LMP (e.g. on child and forced labour and non-discrimination).</p> <p>b) Key principles of the human resources documents are to be shared with Project workers in a clear and understandable manner.</p>	<p>a) Human rights policies and procedures developed</p> <p>b) Demonstrated communication of HR policies and procedures to workers (e.g. training logs and materials)</p>	<p>a) Prior to Signing</p> <p>b) Prior to Financial Close</p>	Open
LW3	Update the Labour Management Plan for construction in order to:	Updated LMP	Prior to Signing	Open

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	<ul style="list-style-type: none"> cover all workers directly involved into the Project and reflect recruitment and working conditions of foreign workers, and worker on-site and off-site accommodation (with cross-reference to the Accommodation Camp Management Plan). Include a commitment to respect trade union rights. Include appropriate provisions on non-discrimination and equal opportunity <p>See ES12 regarding development of appropriate management plans inclusive of monitoring programmes.</p>			
LW4	Develop operation phase Labour Management Plan in line with IFC PS2 and EBRD PR2 inclusive of commitments related to collective dismissals, including the commitment to develop a retrenchment plan if collective dismissals are required.	Operation Labour Management Plan	6 months prior to operations	Open
LW5	Develop a stand-alone Worker Grievance Mechanism in line with the IESC's comments. See ES16 for further recommendations on the Grievance Mechanism.	Updated Grievance Mechanism	Prior to Signing	Open
LW6	<p>a) Implement and monitor supply chain Corrective Action Plan (CAP) developed as part of the independent supply chain due diligence (inclusive of labour audit), including commitments to adhere to Project Sponsors' Supplier Code of Conduct, Human Rights statements and zero tolerance to forced/child labour.</p> <p>b) Project to report to lenders on any identified violations related to forced and child labour.</p>	<p>a) Reports on implementation and monitoring of the CAP</p> <p>b) Reports on violations</p>	<p>a) CAP implementation status update prior to Financial Close; and then to be included in ESMRs</p> <p>b) Throughout Project lifecycle</p>	Open
ERBD PR3; IFC PS3	Resource Efficiency and Pollution Prevention			
PP1	Develop the site specific Water Management Plan which shall include feasible mitigation measures, requirement to undertake baseline samples for physicochemical characteristics and quantitative data for ground and surface water, thresholds (Project standards) for water quantity (groundwater) and quality (groundwater and surface water), environmental monitoring parameters, references to technical documentation (e.g. crossing of rivers; drilling of wells) and/or other relevant technical procedures or specification (e.g. protection of water courses banks, spill prevention measures, septic tanks installation etc) and targets and KPIs for water consumption and pollution prevention.	C-ESMP or Water Management Plan	Prior to Financial Close or 3 months prior to start of construction whichever is sooner	Open

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PP2	Provide GHG emissions assessment in Scope 1 and Scope 2 for construction and operation in the Project boundaries compliant with the IFC PS3 and EP4 requirements and aligned with the GHG Protocol. A high level GHG estimations should be sufficient due to the Project type.	GHG emissions assessment	Prior to Signing	Open
PP3	Develop site specific Waste and Wastewater Management Plan and the Soils Management Plan (addressing on site waste management and wastewater treatment, management of excavation materials and identification of suitable deposit locations; including soil disposal/ re-installment).	Waste and Wastewater Management Plan, Soils Management Plan	Prior to Financial Close or 3 months prior to start of construction whichever is sooner	Open
PP4	Develop Blasting Management Plan which shall include air-borne noise and vibration impact assessment, monitoring requirements (including pre-blasting monitoring surveys) at sensitive receptors, community communications protocol and KPIs. In addition, management of explosives and residues shall be included in the plan.	Blasting Management Plan	Prior to Financial Close or 3 months prior to start of construction whichever is sooner	Open
PP5	Incorporate pesticide use, storage, handling, and disposal requirements into the Hazardous Materials Management for operation.	C-ESMP or Hazardous Materials Management Plan	6 months prior to operation	Open
EBRD PR4; IFC PS4	Community Health, Safety and Security			
CHS1	<p>Update the Community Health, Safety, and Security Plan (CHSSP), ensuring it is further developed with input from the EPC contractor (where needed) to guarantee practical and effective implementation.</p> <ul style="list-style-type: none"> Develop and integrate a Community Incident Reporting Procedure into the CHSSP Define monitoring requirements for different types of community incidents. Include mitigation measures for risks related to hazardous materials handling (e.g., blasting) and unplanned events, including community communications protocols. Include turbine setback distances and safety zones for electromagnetic exposure from OHTL. 	Construction Community Health, Safety, and Security Plan	Prior to Financial Close or 3 months prior to start of construction whichever is sooner	Open

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	<ul style="list-style-type: none"> • Include shutdown protocols for ice throw/blade throw risks (if required by ESIA outcomes). • Add mitigations for accidental access by herders/livestock on construction sites. • Expand measures for disease prevention during the construction phase. • Introduce measures from the radiological assessment. • Include consideration of vulnerable groups and their interactions with security personnel, including risks related to GBVH (Gender-Based Violence and Harassment). • Ensure mitigation measures protect community access to resources and livelihoods (e.g., grazing land, access to water wells). • Cross-reference relevant plans (e.g., Water Management Plan, SEP) for integrated implementation. 			
CHS2	Update the Influx Management Plan: <ul style="list-style-type: none"> • Add a Code of Conduct for workers. • Include measures for managing worker-community interactions. • Integrate disease prevention and outbreak management procedures. 	Construction Influx Management Plan	Prior to Financial Close or 3 months prior to start of construction whichever is sooner	Open
CHS3	The Project to provide verification note that detail design meets applicable standards. The Project to provide an overview of the design approval procedure and highlight who is responsible for ensuring design compliance with safety standards.	Verification Note	Prior to Financial Close	Open
CHS4	Disclose relevant information about risks and emergency response procedures for construction to affected communities and coordinate with relevant emergency response stakeholders. Define procedures for emergency drills involving communities, with local authority participation, and include in the EPRP.	Proof of disclosure	At least 1-month prior to construction activities	Open
CHS5	Disclose relevant information about risks and emergency response procedures for operation to affected communities and coordinate with relevant emergency response stakeholders. Define procedures for emergency drills involving communities, with local authority participation, and include in the EPRP.	Proof of disclosure	At least 3-months prior to operation activities	

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CHS6	Develop a Site Security Plan for construction and provide further details in it on the security arrangements, including how many security personnel guards will be used, whether they will be armed, whether they are license and appropriately train, if they are to be employed from local communities.	Site Security Plan	Prior to Financial Close or 3 months prior to start of construction whichever is sooner	Open
CHS7	Include in the ESMP site security requirements for operation.	ESMP	Prior to Signing	Open
CHS8	Develop/update the Traffic Management Plan for construction, ensuring logistics and management of abnormal load transportation (e.g. Wind turbines) and transport of explosives are included. This Traffic Management Plan shall include details on traffic volumes on local roads, Project traffic and management procedures with particular focus on community health and safety as per IESC comments in Table A5 of the ESDD report.	Construction Traffic Management Plan	Prior to Financial Close	Open
EBRD PR5; IFC PS5	Land Acquisition and Involuntary Resettlement			
LA1	Finalise the LARF after the ESIA disclosure and consultation period and include: <ul style="list-style-type: none"> Proposed programme of seasonal socio-economic surveys and consultation with herders to be undertaken as part of LRP development which is aligned with the construction schedule Commitment to engage a specialised consultancy with regional experience in implementation of PS5/PR5, including experts with experience in managing impacts on seasonal herders and agricultural and livelihood restoration experts Detailed mapping of areas (based on current information and information gathered during the disclosure period) where construction should be avoided until LRP has been developed and appropriately implemented e.g. buffer zones around water sources Use the above to inform the integrated E&S and construction schedule (item ES7). 	Final LARF	Prior to Signing	
LA2	Develop the Livelihood Restoration Plan (LRP) in line with EBRD PR5, IFC PS5 and the approach presented in Land Acquisition and Resettlement Framework (LARF). LRP to be inclusive of socioeconomic baseline data on affected herders and other PAPs (including their numbers, mapping of any affected structures, water wells or other critical features) as required by the LARF approach to socioeconomic studies (census, asset inventory and	LRP and GLAC are developed, agreed with Lenders and disclosed	LRP finalised and implemented prior to start of the construction activities, in line with	Open

ID	Corrective Action	Deliverable & Evaluation Criteria	Timeframe	Status
	<p>surveys), and inclusive of verification of data on vulnerable groups and gender considerations as part of vulnerability assessment. Consultation to be undertaken in parallel with surveys to inform final design and proposed livelihood restoration options.</p> <p>Results of surveys and consultation to inform final design of Project including siting of WTGs, access roads and OHTL routing and final tower locations.</p> <p>The LRP to include a clear definition of roles and responsibilities of all parties involved in land acquisition and resettlement process, including governmental bodies; and a clear implementation schedule, including phased approach if required according to the construction schedule.</p> <p>Develop Guidance for Land Acquisition and Compensation (GLAC) based on the LRP.</p> <p>Disclose LRP and GLAC, conduct meaningful consultations with affected parties and put in place a process to allow stakeholders to provide feedback and consult on the LRP.</p> <p>Implement the LRP prior to impact on affected people and conduct LRP implementation monitoring and evaluation as per the program in the final LRP</p> <p>See also actions B17 and B18 on ecosystem services.</p>	<p>Proof of disclosure and consultations on LRP and final LRP</p> <p>LRP Implementation Reports</p>	<p>the phased construction schedule</p> <p>30 days after end of the LRP disclosure</p> <p>Quarterly during LRP implementation</p>	
LA3	<p>a) Undertake a mid-term resettlement review (independent audit) confirming the Project is on track with LRP implementation, including addressing any new impacts</p> <p>b) Appoint a third-party consultant to undertake an LRP Completion Audit to determine if the LRP (and addenda, if any) provision have been met in line with Lender requirements</p> <p>If any discrepancies are identified in the mid-term review or LRP completion audit, develop a LRP corrective action plan with timeline, responsible parties, budget and resources to implement such corrective action plan. Implement any further time-bound corrective actions identified and maintain appropriate social resources within the Project Company until this corrective action plan is implemented</p>	<p>a) ToR and contract for independent consultants; Draft and Final Reports</p> <p>b) ToR and contract for independent consultants; Draft and Final Reports</p> <p>Resources maintained</p>	<p>a) One year after initial LRP measures are initiated</p> <p>b) Within 2 years of LRP implementation completion, or as determined ready in agreement with Lenders</p>	Open
EBRD PR8 / IFC PS8	Biodiversity Conservation and Sustainable Management of Living Natural Resources			

ID	Corrective Action	Deliverable & Evaluation Criteria	Timeframe	Status
B1	Update the ESIA Biodiversity Baseline, Impact Assessment and Critical Habitat Assessment and other associated documents in line with consultation results and to address IESC and Lender comments.	Updated ESIA Baseline and CHA; collision modelling; impact assessment	Included in updated ESIA, following the timeline in ES6	Open
B2	<p>Update the existing construction phase Biodiversity Management Plan (C-BMP, Rev 0) into a detailed, construction ready Biodiversity Management Plan (BMP) that consolidates all biodiversity mitigation and monitoring measures, sets out roles and responsibilities, KPIs, verification and adaptive management procedures, and incorporates species specific mitigation programmes and associated sub plans. The BMP will include but not be limited to the following associated sub-plans and procedures: Vegetation Clearance Procedure and Pre-clearance Checklist Form, Site Walkover Checklist Form, Wildlife Incident Reporting Form, Invasive Alien Species Procedure, Rare and Threatened Plants Protection and Translocation Plan, Nesting Birds Protection Plan, Reptiles Protection and Translocation Plan, Ungulates Protection Plan, Habitat Restoration Procedure.</p> <p>The updated BMP will particularly provide phased construction schedules and species specific mitigation programmes for threatened breeding birds, threatened mammals, reptiles and threatened flora, define monitoring and trigger based adaptive responses for key measures.</p>	Updated BMP, including species specific mitigation programmes, phased construction scheduling and associated sub plans, approved and available for use prior to construction early works.	Final BMP -prior to Financial Close/prior to start of construction whichever is earlier	Open
B3	<p>Develop and disclose a Framework Biodiversity Action Plan (BAP) that defines the relevant Critical Habitat and Priority Biodiversity Features, summarises the associated residual impact profile, outlines the strategy to achieve net gains for Critical Habitat features and no net loss / net gain, as applicable, for PBFs, and no net loss for Natural Habitats and outlines additional conservation programmes and measures to promote and enhance the conservation aims and effective management of the Reserve.</p> <p>The Framework BAP is to be informed by the updated the Critical Habitat Assessment (CHA) documenting the full Critical Habitat and PBF screening process, including a complete candidate list, criteria and thresholds applied, screening rationale and respective mapping of all confirmed and potential Critical Habitat and PBF features within the Project Area of Influence, and a project-wide habitat delineation map.</p> <p>The Framework BAP must acknowledge and provide for integration of existing land use (i.e. grazing) into the strategy both to ensure effectiveness and no significant impacts on land users.</p>	Framework BAP describing CH and PBF features, residual impacts and setting out the net gain / NNL strategy and approach to meeting its obligations.	<p>30 days after the start of the ESIA disclosure</p> <p>Final Framework BAP Prior to Signing</p>	Open

ID	Corrective Action	Deliverable & Evaluation Criteria	Timeframe	Status
	Consult on the Framework BAP during the disclosure period as outlined in the SEP and including with the Zhusandala State Reserved Zone authority to inform the final version.			
B4	<p>Prepare a Full Biodiversity Action Plan (BAP) that sets out detailed residual impact assessment, quantified CH/PBF losses and targets, compensation and net gain measures, implementation responsibilities, budgets, stakeholder engagement and a Biodiversity Monitoring and Evaluation Programme (BMEP).</p> <p>Develop a detailed Natural Habitat No Net Loss Plan within the Full BAP, including specific compensation measures for permanent Natural Habitat loss, implementation responsibilities, budget and monitoring.</p>	Full BAP, including Natural Habitat NNL Plan, detailed measures, targets, implementation arrangements, budget and BMEP.	12 months after Financial Close	Open
B5	Within the Framework BAP (see item B3) in collaboration with the Zhusandala State Reserved Zone authority, outline additional conservation programmes and measures to promote and enhance the conservation aims and effective management of the Reserve. The Framework BAP and subsequent conservation programmes should be based on the results of consultation with the protected area authorities and be guided by the conservation needs of Zhusandala State Reserved Zone. The Framework BAP should describe proposed programmes, their objectives, link to the Reserve's conservation aims, and indicative responsibilities, schedule and monitoring indicators. The Framework BAP should describe proposed programmes, their objectives, link to the Reserve's conservation aims, and indicative responsibilities, schedule and monitoring indicators.	Framework BAP describing proposed additional conservation programmes for Zhusandala with objectives	<p>Consultation during the 60 day disclosure period</p> <p>Final Framework BAP as defined in action B3</p>	Open
B6	In a Full BAP (see item B4), include the agreed conservation programmes for the Zhusandala State Reserved Zone with detailed implementation arrangements, responsibilities, schedule and monitoring/ reporting arrangements.	Full BAP that sets out detailed conservation programmes for Zhusandala	12 months after Financial Close	Open
B7	Prepare a project-specific Invasive Alien Species Management Plan (IASMP) that identifies plausible AIS of concern and main introduction/spread pathways across the Project Area of Influence (including higher-risk locations such as the OHL corridor, construction camps, laydown areas, access roads, settlements and freshwater crossings) and sets out prevention, detection, reporting, response and monitoring measures for construction and operation.	IASMP integrated into the Construction BMP and Project ESMS.	<p>Draft –prior to Signing;</p> <p>Final plan -prior to Financial Close/prior to start of construction (whichever is earlier)</p>	Open

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B8	<p>Undertake a systematic review to identify ecosystem services across the full Project Area of Influence (including ancillary and associated facilities), classify them in line with IFC PS6 and EBRD ESR6, and determine which meet the definition of priority ecosystem services (Type I and Type II), with the rationale documented.</p> <p>For each identified priority ecosystem service where adverse impacts are expected, define appropriate mitigation and resource efficiency measures and integrate these into the Project ESMS and relevant management plans.</p>	<p>Updated ESIA with listed ecosystem services for the full Area of Influence, identified Type I and Type II priority ecosystem services and a described rationale.</p> <p>Updated relevant management plans with agreed mitigation measures for each priority ecosystem service and approach to implementation.</p>	Included in updated ESIA, following the timeline in ES6	Open
B9	<p>Develop Overhead Transmission Line (OHTL) Collision Mitigation Plan for the Project. This will indicate the sections of line on which diverters will be installed based on a qualitative collision risk assessment and the design and configuration of diverters. The plan will be developed based on advice from a qualified consultant ecologist/ornithologist with experience of mitigating OHTL bird collision risk for the priority biodiversity values likely to be impacted and diverters designed to take account of the likely climatic conditions and a long-term guarantee against failure will be secured from the supplier.</p> <p>Engage with the OHTL operator and undertake reasonable efforts such as technical and financial support to ensure that the mitigation measures for the OHTL are implemented and maintained by the OHTL O&M Company throughout the Operation phase.</p>	<p>Overhead Transmission Line (OHTL) Collision Mitigation Plan</p> <p>Handover protocol details</p> <p>financial/technical support from the Project to the OHTL operator throughout the operation ensuring appropriate mitigation of collision risk for birds</p>	<p>2 months prior to commencement of OHTL construction</p> <p>Protocol agreed with OHTL operator prior to handover</p>	Open

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B10	<p>Develop a project-specific Post-Construction Fatality Monitoring (PCFM) Protocol for birds and bats, in line with good practice (i.e. IFC (2023)¹, to refine collision-risk mitigation (including Shut Down on Demand, bat curtailment and bird diverters) for both turbines and the OHTL. The PCFM shall include the definition of fatality thresholds for each species calculated with reference to the Potential Biological Removal which if exceeded will trigger additional actions in accordance with the mitigation hierarchy.</p> <p>The PCFM will be integrated into the adaptive management framework of the ATMP. The PCFM program as a whole will be carried out for an initial minimum 3-year period, but the actual timeframe beyond this will depend on fatality results sufficiently demonstrating negligible risks to the satisfaction of the Lenders. The results should also be used to update residual impact summary and associated No Net Loss/Net Gain targets and compensatory actions as part of the regular Biodiversity Action Plan (BAP) update.</p> <p>The PCFM protocol shall be developed by recognized wind-wildlife consultancy with experience in developing such protocols in accordance with Good International Practice, including in Central Asia which may be a combination of international experts (wind-wildlife experts (WWE)) working with national ecological consultants.</p> <p>The WWE(s) will be retained for the first three years of operations to provide technical support to the local consultancy / expert team on PCFM analysis, seasonal bird and bat activity and carcass monitoring reports, provide input as per the ATMP of the Project, and reporting, training and capacity building. The contract will include two site visits per year (1-month per visit) to conduct independent verification of the PCFM program. The WWE will also oversee BMP/BAP implementation during this time.</p> <p>The WWE(s) will be appointed by the PE as per the requirements of the operations phase BMP on a non-objection basis by the Lenders. The WWE(s) scope will be reviewed with the Lenders every 3 years, and extended with same or new tasks if required subject to the results of the first 3 years program.</p>	PCFM Protocol	6 months prior to operation	Open
B11	<p>The Project will implement selective shutdown on demand (SSOD) measures detailed in the Active Turbine Management Framework (ATMF), including installation of a camera-based imaging system for target bird species based on turbine spatial risk assessment. Where uncertainties exist regarding the collision risk of certain turbines due to survey limitations,</p>	ATFM ATPM	ATMF – 30 days after the start of disclosure	Open

¹ Post-Construction Bird and Bat Fatality Monitoring For Onshore Wind Energy Facilities In Emerging Market Countries (Ifc, 2023)

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	<p>and considering the confirmed presence of globally and nationally threatened bird species, the Project will adopt a precautionary approach by covering such areas with SSOD.</p> <p>The project will implement selective curtailment to reduce collision risk to bat as described in the ATMF.</p> <p>The ATMF will be updated with final commitment on spatial extent of the SSOD, specific turbines to be targeted for curtailment and/or acoustic monitoring. The associated financial implications (CAPEX and reduced energy production) to be defined and shared with the Lenders for agreement.</p> <p>The ATMF will be developed into a full Active Turbine Management Plan (ATMP) The ATMP will be subject to adaptive management and will be reviewed and refined as necessary based on the result of PCFM.</p>		ATMP - At least 6 months prior to operation	
B12	The Project Company will establish a Biodiversity Committee of relevant independent international and national stakeholders (e.g., ornithologists, botanists, mammal experts and herpetologists) who will oversee the implementation and effectiveness of the biodiversity related plans.	<p>ToR for the Biodiversity Committee, defining scope, roles, responsibilities, decision-making authority, and meeting frequency;</p> <p>List of appointed committee members and CVs demonstrating relevant expertise and institutional affiliation;</p> <p>Evidence of integration of the Committee into biodiversity-related plans and procedures.</p>	Prior to construction	Open

ID	Corrective Action	Deliverable & Evaluation Criteria	Timeframe	Status
B13	<p>Develop an integrated construction schedule clearly incorporating E&S pre-construction activities (item ES7), including in relation to Biodiversity:</p> <ul style="list-style-type: none"> species specific pre-construction surveys based on seasonally appropriate timelines seasonal constraints on construction including the need to wait for appropriate survey windows and to implement relevant mitigation measures (e.g. waiting until threatened bulb flora species have finished flowering before undertaking translocation, or delaying construction in steppe tortoise hibernation habitats until hibernation has ended and before breeding nesting begins) construction activities ensuring compatibility with all prerequisite surveys and mitigation measures completed prior to construction in any given area <p>Schedule to be supported by spatial mapping of constraints on the Project footprint.</p>	Integrated construction schedule supported by the constraints map	<p>Draft schedule - 30 days after the start of ESIA disclosure</p> <p>Final schedule - Prior to Signing</p>	Open
EBRD PR8 / IFC PS8	Cultural Heritage			
CH1	<p>Update the impact assessment on cultural heritage in the ESIA to include</p> <ul style="list-style-type: none"> confirm if the Project sites for all components are covered by archaeological survey mapping. Provide mapping of the identified objects of historical and cultural heritage (OHCHs) on and in vicinity of the Project sites, and update mitigation measures and commitments as per national approvals, findings of the archaeological examination and international good practice. 	Updated ESIA	Prior to Signing	Open
CH2	<p>Update the Cultural Heritage Management Plan (CHMP, covering tangible and intangible cultural heritage), to</p> <ul style="list-style-type: none"> include robust mitigation measures for tangible and intangible heritage impacts in construction, information on identified OHCHs, archaeologist presence and responsibilities, and Chance Find Procedure (CFP) (also refer to items below). Include a requirement for dedicated discussions and documenting outcomes regarding community access to cultural heritage sites and the respective measures in the Cultural Heritage Management Plan, if relevant. 	Cultural Heritage Management Plan	<p>Draft CHMP prior to Signing</p> <p>Final CHMP – Prior to Financial Close</p>	Open

ID	Corrective Action	Deliverable & Evaluation Criteria	Timeframe	Status
CH3	Hire site archaeologist/ archaeological expert for daily supervision during all site clearance and earthworks during construction. Appoint the site archaeologist (or specialised subcontractor/consultant offering such services) before any site clearance or earthworks.	Project Organogram	Prior to Financial Close 1 month prior to any site clearance or levelling activities.	Open
CH6	Update the Chance Find Procedure with contact information of authorities responsible for archaeological and cultural protection, as well as provisions for if human remains are identified.	Chance Find Procedure	Prior to Financial Close	Open