Confidential

REPORT

Lenders' Environmental and Social Advisor - SCATEC 200 MW Wind Power Plant, Gulf of Suez, Egypt

Environmental and Social Action Plan

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1.0 INTRODUCTION

This document is the "*Environmental and Social Action Plan"* (ESAP) prepared in relation to the Environmental and Social (ES) review of a 200 MW onshore wind power project (WPP) in the Gulf of Suez, Egypt (the Project). The Project will be developed by a special purpose vehicle (SPV) owned by Scatec, Orascom Construction, the Sovereign Fund of Egypt, and Fertiglobe (the Developer).

The Project is located in the Gulf of Suez, on a plot locally known as the "Italgen plot" 30 km southeast of Ras Ghareb area in the Red Sea Governorate, where other wind development areas and existing wind farms are present. The Project will be connected to the grid via an Overhead Transmission Line (OHTL), a project Associated Facility.

The Developer is seeking finance through various sources including from the European Bank for Reconstruction and Development (EBRD) and other potential Lenders (i.e. European Investment Bank (EIB)). WSP Italia (WSP) has been retained to act as the Lenders' Environmental and Social Consultant (LESC). In its capacity, WSP has reviewed the available Project-related environmental and social documentation and interacted with the EBRD, the Developer, and its consultants to gain a comprehensive understanding of the Project's status.

The EBRD has categorised the Project as "A" according to its 2019 Environmental and Social Policy, in consideration of the size and extent of the Project and its location within the boundaries of the Gebel El Zeit Important Bird Area (IBA designated for migratory soaring birds) which was determined to be Critical Habitat. The Project required a comprehensive Environmental and Social Impact Assessment (ESIA) including public disclosure for a minimum of 60 days.

The ESIA was commissioned in order to apply for the necessary environmental local permits and to comply with EBRD ES Policy and Performance Requirements and with the IFC Performance Standards. Additional complimentary informative studies have been commissioned and prepared by different specialised consultants.

Since October 2024 WSP has undertaken a review of the comprehensive Environmental and Social documentation and has collaborated with the Developer to ensure that all documents meet the expectations of the EBRD and other lenders.

This document includes an ESAP listing the actions that still remain to be implemented but are not considered preconditions for ESIA disclosure. As such the ESIA documentation provide to date is considered meeting the minimum requirements for disclosure according to the EBRD ES Policy and the other applicable requirements presented below.

1.1 Applicable Project E&S Standards

The applicable Project E&S Standards are as follows:

- Egyptian environmental, social, health and safety laws and regulations, including national obligations under international law that apply to the Project;
- EBRD ES Policy (2019) and associated Performance Requirements (PRs) and their supporting Guidance Notes (where published);
- European Union (EU) substantive environmental standards (as required by the EBRD), including (but not limited to) the pertinent requirements of the EIA Directive (as updated in 2014) and Birds and Habitat Directives;
- IFC Performance Standards (2012) and associated Guidance Notes;
- EIB Environmental and Social Standards (2022);

- All ILO conventions signed and ratified by Egypt, all ILO conventions covering core labour standards and all ILO conventions covering the basic terms and conditions of employment;
- Gender Based Violence and Harassment (GBVH) relevant guidance note and sector factsheet such as the guidance by CDC and EBRD “”Addressing GBVH in the private sector”.

As the international lender E&S requirements applicable to the Project are broadly consistent with each other, this document is structured to meet the EBRD PRs, with specific sections and language included for those requirements that differ from those of the EBRD, such as, for example, certain Equator Principals IV (EPIV) and specific EIB requirements.

2.0 ENVIRONMENTAL AND SOCIAL ACTION PLAN

The following Table presents the ESAP for the Project. It has been structured following the EBRD ES Requirements, however it also considers other ES standards applicable to the Project.

Table 1: Environmental and Social Action Plan.

Item ID	Action	E&S Risk and Liability	Responsible party	Implementation Deadline	Progress Indicator(s)	Status
EBRD PR1: Assessment and management of environmental and social risks and impacts						
1.1	Develop and implement a comprehensive Environmental and Social Management System (ESMS), including the dissemination of the environmental, social, health and safety, labour, etc policies (presented in the ESHS Manual) that comply with the national requirements and regulations and with the Project's applicable E&S standards. This system will refer to the ESHS Manual prepared by the Developer and shall include the Construction-ESMPs and Operation-ESMPs, respectively to be developed and implemented by Responsible parties for each phase for the WPP and the OHTL.	Lack of proper management of E&S risks	Developer	ESMS in place 2 months prior to start of construction and operation ESMS implemented during construction and operation	ESMS in place and implemented	
1.2	The EPC and O&M contractors will develop and implement their own ESMSs in line with the Project ESMS and Project ESMS requirements. These ESMS will include the necessary resources, structures, policies, procedures, plans, monitoring and reporting requirements to deliver their	Lack of proper management of E&S risks	EPC and O&M contractors	Contractors ESMS implemented during construction and operation	ESMS in place and implemented	

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	responsibilities in line with the requirements of the Project ESMS and Project ES commitments. The EPC and O&M Contractors will ensure that the ESMS requirements extend to their WPP and OHTL contractors and subcontractors through contracting provisions, awareness raising and monitoring.					
1.3	The Developer will make sure that the Project organograms presented in the ESHS manual are refined by establishing Project-specific roles and responsibilities and details about names for each role. The Developer will employ, at a minimum, a Project ESHS Manager, and a female Community Liaison Officer (CLO) with clearly defined roles & responsibilities. The CLO will also function as a Confidante for gender based violence and harassment related grievances of both the workforce and neighbouring communities. The Developer will also designate an HR officer or a Labour Compliance Officer (familiar with internationally funded projects and with overseeing compliance with national labour law and labour related Project E&S Standards). In addition, a Biodiversity Expert satisfactory to the Lenders will be assigned inhouse or contracted under a consultancy agreement during the construction and	Lack of proper management of E&S risks	Developer, EPC and O&M contractors	Full organograms and staff in place 4 months prior to start of construction and 4 months prior to operation	Staff hired and organisation and place and operative	

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	operational phase, the scope and contract duration of which will be decided on needs basis. Additional Wind Wildlife expert/expertise shall be considered by the developer and/or consultancy as necessary. Candidates for the above functions will be selected based on their professional merit, expertise and experience. All functions will be adequately resourced in terms of budget, logistics, and necessary training. The developer will also ensure that the EPC and O&M contractors also structure the roles and responsibilities as per the Project E&S Standards and requirements and appoint appropriate personnel to manage the E&S topics.					
1.4	Establish an HSE department and OHS committee to comply with the Applicable ES Standards and with the provisions of Ministerial Decree 134/2003 when their workforce reaches 50 employees or more. The OHS committee will receive basic OHS training and meet on a monthly basis and maintain monthly meeting minutes as is required by Ministerial Decree 134/2003.	Lack of proper organization and of proper management of E&S risks	Developer, EPC and O&M contractors (if employees exceed the number of 50 people)	HSE Department and committee in place 2 months prior to construction and operation Monthly meeting conducted throughout both the construction and the operation phase	Committee in Place. Meetings registrations and meeting minutes	
1.5	Prepare and keep updated a permit register with the status of all permits and licences for the WPP and the OHTL, as required for the Project construction and operation.	Regulatory compliance risks	Developer	Permits obtained prior starting the construction – as per the single permits requirements – and prior starting operations	Permits Permits register	

Item ID	Action	E&S Risk and Liability	Responsible party	Implementation Deadline	Progress Indicator(s)	Status
	The permits and licenses to obtain include the following: - Egyptian Environmental Affairs Agency (EEAA) approval; - Land use permit; - Mine Clearance Permit; - Licence of Excavation (including disposal of construction waste); - Construction Permit; - Environmental batching plant permit; - Radio frequency approval; - Licence for the handling and storage of hazardous waste; - Approval for emergency response and firefighting plans; - Primary Site Access Route equipment transportation permit and heavy equipment transportation permit; - Construction and Operation Permit for Private Investors – Temporary Permit - to allow construction of the Project; and - Construction and Operation Permit for Private Investors – Permanent Generation Licence – to carry out production, distribution or sale of electricity. Also ensure that the conditions of the Environmental Permit issued by the EEAA for WPP and OHTL are fully implemented.					
1.6	Cascade down the corporate Supply Chain Management System to the Project to ensure that the contractors and subcontractors selection	Supply chain and reputational risks	Developer	System (Project procedure) in place 2 months prior to start construction and 2 months prior to operation	System (Project procedure) in place and implemented	

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	process includes environmental and social selection criteria and processes for taking action to address potential environmental and social risks and liabilities identified. Selection criteria to consider the past performance of suppliers, contractors, or intermediaries with regard to labour management (i.e., child labour, forced labour, etc.) and occupational safety and health; and their current capacity to implement Lender requirements. Process documentation will include a position statement on avoiding supply chain risks (forced labour, child labour, risk of material harm to workers) and requirements for supplier risk screening, legal covenants for tenders and contracts, supplier verification and auditing, and supply chain traceability where risks are identified.			System implemented during construction and operation	Suppliers and contractors verifications and audits reports	
1.7	The Project's suppliers selection system shall be cascaded down to and implemented by all contractors. Contractors shall adhere to the Project SCMS and declare their commitment to this.	Supply chain and reputational risks	EPC contractor	System in place (EPC Commitment to accept and apply the Project SCMS) 2 months prior to start construction and 2 months prior to operation System implemented during construction and operation	System in place and implemented Suppliers and contractors verifications and audits reports	
1.8	Contracts with the EPC and O&M contractor to include environmental, health, safety and social	E&S risks and regulatory	Developer	Contracts in place 4 months prior to construction	Contracts in place and updated as necessary. E&S requirements in contracts.	

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	requirements, as per the Developer's and Project's E&S Standards.	compliance risks		Contract updated, as necessary, along the construction phase		
1.9 (EPIV req.)	Contract a Lenders' Environmental and Social Consultant (LESC) to undertake independent environmental and social monitoring. The monitoring will include periodical site visits, quarterly during construction, and semi-annually (twice a year) during the first two years of operation. The LESC should issue a report after each monitoring activity describing the Project's E&S performance and the compliance with the environmental and social standards, laws and regulations. During each monitoring, the LESC should also check and verify the effective and proper implementation of this ESAP.	Project progress, Environmental, Social and Occupational Health and Safety risks and regulatory compliance risks	Developer	LESC appointed prior to construction LESC monitoring visits conducted quarterly throughout the construction and twice a year during the operation ESAP review at each monitoring	Contract with the LESC in place LESC construction phase quarterly E&S monitoring report LESC operation phase semi-annually E&S monitoring report ESAP comments and ESAP actions closed	
1.10	The Developer will ensure that all relevant ESMPs to be prepared according to the ESIA and to this ESAP address both the WPP and the OHTL.	Scope of ESMP	Developer	Management plans scope addresses both the WPP and the OHTL	ESMPs available and addressing the full Project scope	
1.11	Contractually require the wind turbine supplier to commit to implementing a robust supplier management and traceability system for their pre-screened suppliers to avoid labour risks in the wind turbine supply chain (following the a	Supply chain management	Developer	Prior to contracting wind turbine supplier. Agreed in principle prior to Project decision making by lenders. Semi-annual reporting on SC commitments status	Appropriate requirements in wind turbine supply and O&M services contractor contracts to avoid labour issues and risks. Semi-annual monitoring report on SC commitments	

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	standard template for WTG supplier reporting shared by the EBRD) . The wind turbine supplier will be required to report to the Developer on implementation of its supply chain (SC) commitments on a semi-annual basis using an agreed reporting template with relevant supporting materials. If required, the Developer can request the 3rd party on-site verification of the selected facilities of wind turbine vendor's suppliers to confirm that the wind turbine components were sourced from the ring-fenced suppliers.			After the components have been produced/assembled	On-site verification report of the wind turbine vendor's selected supplier's facilities.	
EBRD PR2: Labour and working conditions						
2.1	Contractors will adopt HR policy and procedures to be based on the provisions included in the ESHS Manual and to align with the labour related aspects of the Project E&S Standards. In addition to procedures, a Labour and Local Recruitment Management Plan and training strategy will be prepared and implemented. The worker grievance mechanism will be made available to all workers including contractor workers. Develop an appropriate Gender Action Plan that outlines measures to prevent and address sexual	Lack of labour MP and Grievance Mechanism	EPC and relevant contractors	Relevant policy and plans in place 2 months prior to start of recruitment process	Policies and plans available.	

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	harassment, intimidation, and/or exploitation and promote equal opportunities for women.					
2.2	Ensure the management plans to be prepared as per the previous action 2.1 include monitoring provisions for labour and working conditions compliance monitoring, as follows: - Routine internal monitoring, by the Project, of labour and working conditions including labour contracts, safety inspections, records of incidents, grievance records etc. to ensure compliance with national law and international standards. - - Annual labour and working condition audits conducted by a third party during construction (two audits expected to align with 1 year of construction and then peak workforce). - Frequent monitoring of workers of all contractors through random spot checks of workers contracts, payroll, overtime, awareness, and use of Project grievance mechanism; through interviews and review of workers files; - Review of worker grievance logs (including contractors and subcontractors on site); - Review of training records; and - Monthly reporting on compliance against Project HR policies and procedures	Lack of labour condition monitoring provisions	Developer and EPC	Relevant monitoring provisions in place as part of the labour and local recruitment management plans 1 month prior to start of the recruitment process.	Monitoring provisions available. Monitoring results available and periodical spot checks with no non-compliances.	

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	- Regular training to workers on key HR procedures, including grievance mechanism, GBVH procedures, working conditions (minimum wage, working hours, over time requirement) and health and safety					
2.3	Require Project EPC Contractor to develop an appropriate workers' accommodation plan in line with EBRD/ IFC guidelines on Workers' Accommodation: Processes and Standards. The Developer will undertake an audit of the worker accommodation facilities prior to occupancy, followed by quarterly audits.	Workers risk management	Developer and EPC	Relevant plan is in place 2 months before construction. Audit before occupancy and then quarterly.	Plan available for review which also includes monitoring provisions. Audit result available before occupancy and thereafter.	
2.4	Prepare a Worker Welfare Facilities Plan to address basic human rights and needs during construction – especially given the size of the construction site. Plan addresses issues such as continuous access to potable water, mobile shelter from extreme weather (heat/ cold/ wind), mobile rest areas for lunch, prayer, mobile toilet facilities, adequate communication facilities (mobile phone coverage and re-charge options), etc.	Mitigate risk of sub-standard working conditions	Developer and EPC Contractor	2 months prior to construction	Worker Welfare Facilities Plan	
EBRD PR3: Resource efficiency and pollution prevention and control						
3.1	Develop and implement an Air Quality Management Plan to include strategies aimed at mitigating air emissions during construction.	Air quality degradation	EPC Contractor	Plan in place 2 months prior to start construction Plan implemented during construction	Plan in place and implemented Construction phase monitoring campaigns quarterly reports	

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	The plans should comply with the national and international requirements and regulations and with the Project E&S Standards. The plan should also refer to the Project's ESHS Manual and should be integrated into the overall management system for effective and consistent management by the EPC Contractor. The Plan should detail all operational and control measures appropriate to the management and control of air emissions (e.g., quarterly TSP, PM10 and PM2.5 monitoring campaigns). The plan shall always include measurable indicators (KPIs) to track the progress towards reaching those goals or benchmarks.					
3.2	Prepare and implement a Project-specific Noise Management Plan and refer to the Project ESHS Manual, considering both construction and operation phases. The Plan will include the following minimum noise monitoring requirements: - Conduct 48 hours of continuous noise measurements with 15 minutes intervals, at the baseline noise measurement locations and at the closest sensitive receptors where active construction activities are undertaken, on quarterly basis during the construction phase.	Increase of noise emissions and shadow flicker effect	EPC and O&M Contractors	Noise Management Plan in place 2 months prior to start construction and 2 months prior to operation Noise measurements data available during construction and operation phases Noise or Shadow flicker registered grievances	Noise Management Plan in place and implemented Laboratory reports regarding to construction phase noise measurements Laboratory reports regarding to operation phase noise measurements Records on grievances due to noise, laboratory reports regarding to noise measurements, non-compliances, mitigation and follow-up actions	

Item ID	Action	E&S Risk and Liability	Responsible party	Implementation Deadline	Progress Indicator(s)	Status
	- Conduct 48 hours continuous noise measurements with 15 minutes intervals, at the baseline noise measurement locations, on annual basis during the first two years of the operation phase. In case noise measurement results indicate that noise levels are not within allowable limits defined by Project E&S Standards, continue on noise measurements on annual basis. - Conduct 48 hours continuous noise measurements with 15 minutes intervals during the construction and operation phases, if any noise related grievance received from the stakeholders. - If any shadow flicker related grievance received from the stakeholders and in case limit values provided in Project E&S Standards are exceeded due to the contribution of the Project operation, decide on mitigation measures (e.g. improving the curtailment conditions at the receptor, limiting the operational hours of the certain WTGs for the certain hours at certain dates/seasons) with grievance holder.				Records on grievances due to shadow flicker, non-compliances, mitigation and follow-up actions	
3.3	Develop and implement a Soil Management Plan to include strategies aimed at mitigating	Soil degradation	EPC Contractor	Plan in place 2 months prior to construction Plan implemented during construction	Plan in place and implemented	

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	potential impacts on soil during construction. The plans should comply with the national and international requirements and regulations and with the Project E&S Standards. The plans should also refer to the Project's ESHS Manual and should be integrated into the overall management system for effective and consistent management by the EPC Contractor. The plan shall always include measurable indicators (KPIs) to track the progress towards reaching those goals or benchmarks.					
3.4	Develop and implement a Flooding Risk Management Plan to include strategies aimed at properly preventing and managing potential flooding events during construction and operation. The plans should comply with the national and international requirements and regulations and with the Project E&S Standards. The plans should also refer to the Project's ESHS Manual and should be integrated into the overall management system for effective and consistent management by the EPC and O&M Contractors. The plan shall always include measurable indicators (KPIs) to track the progress towards reaching those goals or benchmarks.	Project site flooding, damage to facilities machinery and equipment and health & safety issues	EPC and O&M Contractors	Plan in place 2 months prior to start construction and 2 months prior to operation Plan implemented during construction and operation Plans and designs in place and implemented confirming Project-embedded flooding risk protective and preventive measures 2 months prior to start construction phase	Plan in place and implemented Plans and designs in place and implemented confirming the Project-embedded flooding risk protective and preventive measures	

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3.5	Develop and implement a Wastewater Management Plan to include strategies aimed at properly managing the process and the domestic wastewater and the stormwater during construction. The plan should comply with the national and international requirements and regulations and with the Project E&S Standards. The plan should also refer to the Project's ESHS Manual and should be integrated into the overall management system for effective and consistent management by the EPC Contractor. The plan shall always include measurable indicators (KPIs) to track the progress towards reaching those goals or benchmarks.	Environmental degradation and health & safety issues	EPC Contractor	Plan in place 2 months prior to construction Plan implemented during construction	Plan in place and implemented	
3.6	The Project to confirm with the Ras Ghareb Waste Water Treatment Plant (WWTP) that the facility has sufficient capacity to receive the Project's wastewater and obtain a list of authorized contractors for collection and transportation of wastewater.	Environmental degradation and health & safety issues	Developer	Agreement stipulated between the Developer and Ras Ghareb WWTP prior to construction phase Agreement renovated and in place during construction	Proofs of engagement with the Ras Ghareb WWTP prior to start of construction (e.g., meeting reports) Proofs of the agreement stipulated among the Developer and Ras Ghareb WWTP (e.g., contract) and renovated throughout the Project life	
3.7	Develop and implement a Waste Management Plan to include strategies aimed at properly managing the hazardous and non-hazardous solid and liquid waste during construction and operation. The plan should comply with the national and international	Environmental degradation and health & safety issues	EPC and O&M Contractors	Plan in place 2 months prior to start construction and 2 months prior to operation Plan implemented during construction and operation	Plan in place and implemented	

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	requirements and regulations and with the Project E&S Standards. The plans should also refer to the Project's ESHS Manual and should be integrated into the overall management system for effective and consistent management by the EPC and O&M Contractors. The plan should detail all operational and control measures appropriate to the management and control of the licensed waste plants, facilities and management companies (e.g., periodical audits). The plan shall always include measurable indicators (KPIs) to track the progress towards reaching those goals or benchmarks.					
3.8	Ensure that the Ras Ghareb Public Dumpsite has the required permits and request to audit the facility regarding its compliance with Good International Practice (GIP). In case the landfill is not appropriate for Project waste, identify an alternative site or provide a justification for using the Ras Ghareb site. If the Ras Ghareb site is the chosen option, confirm with the Ras Gharib City Council that the facility Ras Ghareb Public Dumpsite has sufficient capacity to receive the Project's waste during both construction and operation and obtain a list of authorized contractors for the collection and transportation	Environmental degradation and health & safety issues	Developer and /or EPC	Facility permits two months prior to start of construction. Agreement stipulated between the Developer and an alternative waste management site or with Ras Ghareb Public Dumpsite and City Council prior to construction phase. Agreement renovated and in place during construction and operation.	Justification of the landfill selection. Proofs of the agreement stipulated between: - the Developer and /or the EPC and the Ras Ghareb Public Dumpsite or the owner of the alternative landfill; - between the Developer and /or the EPC and the waste managers (e.g., contracts). Proofs of such agreements renovated throughout the Project life.	

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	of hazardous and non-hazardous solid and liquid waste.					
3.10	Develop and implement a Hazardous Materials and Products Management Plan to include strategies aimed at properly managing all kinds of solid and liquid hazardous materials and products during construction and operation. The plan should comply with the national and international requirements and regulations and with the Project E&S Standards. The plan should also refer to the Project's ESHS Manual and should be integrated into the overall management system for effective and consistent management throughout the EPC and O&M Contractors. The plan shall always include measurable indicators (KPIs) to track the progress towards reaching those goals or benchmarks.	Environmental degradation and health & safety issues	EPC and O&M Contractors	Plan in place 2 months prior to construction and 2 months prior to operation Plan implemented during construction and operation	Plan in place and implemented	
3.11	Develop and implement a Resource Efficiency Management Plan to include strategies aimed at ensuring that resources such as water and materials are used efficiently at all stages of their lifecycle (extraction, transport, manufacturing, consumption, recovery and disposal) and throughout the supply chain. The plan should comply with the national and international	Resources and materials (e.g., water, energy, raw materials) waste, depletion and exploitation.	EPC and O&M Contractors	Plan in place 2 months prior to start construction and 2 months prior to operation Plan implemented during construction and operation	Plan in place and implemented	

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	requirements and regulations and with the Project E&S Standards. The plan should also refer to the Project's ESHS Manual and should be integrated into the overall management system for effective and consistent management by the EPC and O&M Contractors. The plan shall always include measurable indicators (KPIs) to track the progress towards reaching those goals or benchmarks.					
3.12 (local reg.)	Develop and implement an Environmental Register according to Law 4/1994. Ensure the environmental register contains updated information on all e air quality, noise, light intensity, heat stress, waste management and emergency response planning.	Environmental degradation and resources and materials waste, depletion and exploitation.	Developer, EPC and O&M Contractors	Register in place 2 months prior to construction and 2 months prior to operation Register implemented during construction and operation	Register in place and implemented	
EBRD PR4: Health, safety and security						
4.1	Develop an OHS Management Plan for construction and for operations that includes procedures applicable to all Project activities and operations that may affect the safety and health of workers. The plan will include all required procedures of job hazard analysis, permit to works, workplace safety and housekeeping, safety inspections, use of PPE, and the like. The plan will also include provisions for ordinary and emergency medical	Worker's safety	Developer, EPC and O&M Contractors	Plan in place two months prior to the start of Construction and operations	Plan available for review with the minimum content required	

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	assistance on site and response in case of accident.					
4.2	The developer will: a) Identify public safety hotspots (schools, hospitals, Mosks, churches, pedestrian crossings, etc.) along the transportation routes from Port to Project and identify mitigation measures as described in ESIA. b) Develop a code of conduct for influx workforce taking up temporary residence in Ras Ghareb and monitor potential misconduct. c) Monitor vis-a-vis health/safety impacts of wind turbines (in relation to potential noise and shadow flickering) for the Wadi Dara residents, especially as future cumulative impacts may occur, due to other wind farm developments.	Impacts of influx of workers, increase in traffic and wind turbines on residents	Developer, EPC and O&M Contractors	a) Prior to construction, when EPC Contractor has decided on transportation routes b) 2 Months prior to Construction c) During operation	– Traffic & Transportation Management Plan adequately addresses this issue – Code of Conduct ready for non-local workers taking up local residence – Monitoring procedure for wind turbine impacts ready	
4.3	Based on the results of the previous action (4.2), item a), develop and implement a comprehensive Traffic and Road Safety Management Plan in compliance with Egyptian Traffic Rules and Regulations and applicable guidelines and good practice for the transport of Project materials and workers. The plan will include traffic safety measures for communities and workers, vehicle inspection and maintenance programs, Key Performance	Transport risks for communities and workers	EPC Contractor, O&M Contractor	Plan in place two months prior to the start of Construction and operations	Plan available for review with the minimum content required	

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	Indicators (KPIs), a tracking system for traffic violations to identify areas for improvement, journey management plans covering all aspects of road transport safety and the like. The plan will also include regular Defensive Driving Training for all drivers, maintain records of training, attendance, vehicle maintenance, and ensure that all measures are documented and accessible for review and auditing purposes.					
4.4	Develop a Community Health & Safety Plan to manage site access during construction, including fencing / physical barriers, access controls, warning signage and monitoring of security (patrols, etc.). A similar plan is to be developed for operations, to include community safety provisions and security access and the monitoring program specified under item 4.2c	Community health and safety issues	EPC Contractor, O&M Contractor	Plan in place two months prior to the start of Construction and operations	Plan available for review with the minimum content required	
4.5	Develop a Security Management Plan in accordance with the Voluntary Principles of Security and Human Rights, and the IFC Good Practise Handbook – Use of Security Forces, including procedures and code of conduct. The plan will include provisions for training of security service provider staff and possible Bedouin security guards on proportionate use of force, when it comes to protecting the Project against minor crimes and	Prevent potential conflict between security guards and residents/ construction work force	Developer and EPC Contractor	Two months prior to construction, and in any case upon mobilization of security staff	Plan is available for review. Records demonstrating that all staff is trained and attendance lists available	-

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	theft. Material crimes to be handled by the authorities.					
EBRD PR6: Biodiversity conservation and sustainable management of living natural resources						
6.1	The BMP (or the Operational BMP) will be updated to include an approach for installing appropriate bird diverters to the Overhead Transmission Line (OHTL) associated with the Project. The design and configuration of diverters used will be 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.	Ensuring delivery of required biodiversity mitigation for the lifetime of the Project	Developer together with EETC	Prior to OHTL construction	BMP updated to provide this detail	
6.2	Develop an Operational BMP that will include an Active Turbine Management Program to detail how collision risk impacts from the operational WPP will be mitigated.	Ensuring delivery of required biodiversity mitigation for the lifetime of the Project	Developer	Prior to commissioning	Operational BMP developed and implemented	
6.3	Develop a Habitat Restoration Plan (HRP) to deliver the required restoration of habitats that have been temporarily disturbed by the Project. In addition, the HRP will provide details on the rehabilitation required to deliver NNL for Natural Habitat residual impacts. The HRP will include details on how NNL has been	Ensuring delivery of required biodiversity mitigation for the lifetime of the Project	Developer	By end Q3 2025	HRP developed and implemented	

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	calculated and will be delivered, with links to the above BMEP (Biodiversity Monitoring and Evaluation Plan) to ensure effective monitoring and identification of adaptive management (as required).					
6.4	Develop a *dabb lizard* Translocation Plan to be adopted during pre-construction works. This should detail the specific methods and programme required to be implemented to deliver mitigation measures for dabb lizard. The translocation plan should seek to adopt methods successfully deployed on other projects in the region (e.g. Amunet). If possible. The plan should detail monitoring requirements, which should also be included within the BMP.	Ensuring biodiversity mitigation for the lifetime of the Project	Developer	Prior to construction commencing	Dabb lizard translocation plan developed and implemented.	
6.5	Develop a plan for the promotion of conservation efforts to be applied to the Gebel el Zeit KBA. This should comprise a Memorandum of Understanding (MoU or similar) in which commitments to further the conservation efforts at Gebel el Zeit are made, or which confirms Lender approval of such commitments not being required.	Ensuring delivery of required biodiversity mitigation for the lifetime of the Project	Developer	By end-Q4 2025	MoU developed and approved by Lenders	
6.6	Contract a nationally recognized wind-wildlife consultancy to design, implement and manage a Biodiversity Monitoring and Evaluation Plan (BMEP) to ensure	Ensuring delivery of required biodiversity mitigation for	Developer	Prior to commissioning	BMEP developed and implemented	

Item ID	Action	E&S Risk and Liability	Responsible party	Implementation Deadline	Progress Indicator(s)	Status
	ongoing efficacy of the Biodiversity Action Plan (BAP) and BMP measures. The BMEP, BAP and BMP will apply to the WPP and the OHTL. As part of this and given that the ongoing efficacy (and additionality) of proposed offsets is not known, effective monitoring and adaptive management will be required in order to deliver the offsetting objectives in the long-term. The BMEP will detail monitoring commitments and responsibilities so that confidence in the offsets for the life of the Project (at least) can be evidenced.	the lifetime of the Project				
6.7	The Project will engage a nationally recognized wind-wildlife consultancy to design, implement and manage a Post Construction Fatality Monitoring (PCFM) program for turbines and the OHTL to cover monitoring for both bats and birds.	Ensuring the efficacy of required biodiversity mitigation for the lifetime of the Project	Developer	Prior to commissioning	PCFM program developed and implemented	
6.8 (EIB req.)	Expand the BAP to provide more detail on species-specific targets to deliver Net Gain for Critical Habitat triggers, in line with the more explicit requirements of EIB in this regard (Standard 3) to the satisfaction of the Lenders. This should comprise more detail within each offsetting option to highlight how the target numbers for each species will be met.	Compliance risk with EIB Standards	Developer	During disclosure period	BAP updated to address these gaps	

Item ID	Action	E&S Risk and Liability	Responsible party	Implementation Deadline	Progress Indicator(s)	Status
	Additional information should also be provided to present further assessment of the feasibility of the onsite options and possible alternative approaches outside the region/country.					
6.9	The BAP will be updated to finalise the offset options that will be pursued and the commitments required (and from whom) to deliver these options. Additionally, the option for co-developing an offset strategy with the SWE project, or other WPP projects, will be agreed/discarded (as appropriate).	Ensuring delivery of required biodiversity mitigation for the lifetime of the Project	Developer	During disclosure	BAP updated to address these gaps	
6.10	Develop an Offset Management Plan (OMP) (or similar) that will provide operational information regarding the delivery of the chosen offset(s) as per options presented within the BAP/OFS. The OMP will be developed by a suitably qualified (international) expert in offsetting with the aim of delivering Net Gains for those Critical Habitat triggering species for which residual adverse impacts have been identified.	Ensuring delivery of required biodiversity mitigation for the lifetime of the Project	Developer	Prior to commissioning	OMP developed and implemented	
6.11	Liaise with relevant national authorities, organisations and RCREE to ensure that appropriate resources are available to deliver the ATMP, specifically the turbine shut down on demand programme and fatality monitoring. This would include support for the training and	Biodiversity risk management resources	Developer and biodiversity contractors	Prior to operation and during life of the Project	Appropriate evidence provided in Developer's initiatives and activities training programme for local bird observers.	

Item ID	Action	E&S Risk and Liability	Responsible party	Implementation Deadline	Progress Indicator(s)	Status
	capacity building of local bird observers and other resources required, including on-the-job training (additional to the trained observers) preferentially resorting to people from the neighbouring town of Ras Ghareb.					
6.12	Support the independent expert review, including by biodiversity focussed civil society organisation experts, of approaches, protocols, procedures, criteria and resulting data related to the Project's migratory soaring bird monitoring, the ATMP and post construction fatality monitoring. This would include the disclosure of relevant information and data to support such reviews as well as active engagement with relevant stakeholders.	Biodiversity risk management	Developer and biodiversity contractors	During life of the Project	Support of independent expert review of approaches, protocols, procedures, criteria and resulting data related to the Project's migratory soaring bird monitoring, the ATMP and post construction fatality monitoring, including the disclosure of relevant information and data to support such reviews as well as active engagement with relevant stakeholders.	
6.13	A Biodiversity Action Plan (BAP) implementation budget estimate will be established for the life of the project, with annual estimates, including provision for inflation, included in the project financing documents. The budget may need to be revised as needed during the life of the Project to ensure Project commitments on No Net Loss and Net Gain are achieved.	Ensuring delivery of required biodiversity mitigation for the lifetime of the Project	Developer	Budgeting plan agreed with Lenders prior to Lender decision making	Budgeting plan developed, agreed with lenders and reflected in Project financing documents, and implemented.	
EBRD PR7: Indigenous Peoples – Not Applicable						

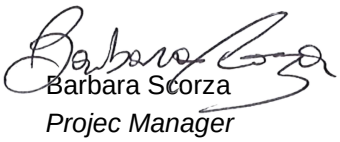
Item ID	Action	E&S Risk and Liability	Responsible party	Implementation Deadline	Progress Indicator(s)	Status
EBRD PR8: Cultural heritage						
8.1	To anticipate unexpected findings of archaeological value, develop a 'Chance Find Procedure' as described in Lender E&S requirements.	Preservation of cultural heritage	Developer and EPC Contractor	2 months prior to construction	Chance Find Procedure in Place	
EBRD PR10: Stakeholder engagement						
10.1	Simplified, Arabic versions of the NTS in the form of hand-outs and presentations for construction workforce and neighbouring communities, including Bedouin.	Ensuring adequate and culturally appropriate communication between the Project and its stakeholders.	Developer and EPC Contractor	2 months prior to construction	– Simplified, Arabic versions of NTS readily prepared	
10.2	Due to the Project being constructed on land that falls under the Bedouin's traditional Ghafra system, the following actions must be taken to prevent future issues in neighbourly relations with Bedouin communities and their access to economic/ social benefits generated by the Project, and for maintaining good relations with neighbouring Wadi Dara residents/ business owners: (a) Assign dedicated Community Liaison Officer (CLO) for these communities as ESAP 1.3. (b) Prioritize a proactive roll-out of the Project's Stakeholder Engagement Plan/ Grievance	Safeguarding the Project's Social Licence to Operate.	Developer, EPC and O&M Contractors	(a) 2 months prior to construction (b) 2 months prior to construction (c) During construction (d) During construction (e) During operation	– CLOs recruited – Adequate record keeping for grievances – 'Dissemination of Information' protocol developed with EPC Contractor – Monitoring procedure for wind turbine impacts ready – Monthly reporting on (b), (c), (d), and (e)	

Item ID	Action	E&S Risk and Liability	Responsible party	Implementation Deadline	Progress Indicator(s)	Status
	Redress Mechanism (SEP/ GRM). (c) Ensure timely dissemination of information on potential construction related disturbances for these communities. (d) Aim to maximize economic/ social benefit sharing with these communities. (e) Monitor vis-a-vis potential health/safety impacts of wind turbines (related to noise and shadow flickering) on the Wadi Dara residents. In case grievances are recorded, mitigation will be adopted following the Noise MP and the monitoring shall be extended for further period, until grievance is closed.					
10.3	(a) Implement, monitor, and record all activities as foreseen in the Project Stakeholder Engagement Plan (SEP), including its responsibilities under the Grievance Redress Mechanism (GRM). (b) Ensure that priority is given, and adequate human/ financial resources allocated, to implement stakeholder engagement activities and disclosure of information.	Stakeholder engagement and dissemination of information	Developer, EPC and O&M Contractors	Ongoing during all Project phases	– SEP and GRM implemented, and records kept. – Selection of CLOs/ HR Mgr. – SEP/GRM budget to – Bi-annual update of SEP and GRM (if applicable).	

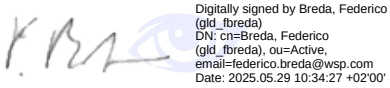
Item ID	Action	E&S Risk and Liability	Responsible party	Implementation Deadline	Progress Indicator(s)	Status
	(c) Update the SEP and GRM with relevant changes in stakeholders or SE approach/ activities, bi-annually during the construction phase.					

Signature Page

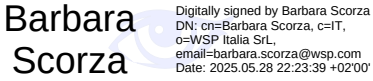
WSP Italia S.r.l.



Barbara Scorza
Projec Manager



Federico Breda
Project Director



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