

ENVIRONMENTAL AND SOCIAL ACTION PLAN

NEW CONSTRUCTION OF A CHP PLANT WITH A CAPACITY OF 250 MW OF ELECTRICITY IN KAMIANSKYI DISTRICT, DNIPROPETROVSK REGION

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD ESPR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	
ESR1	Assessment and Management of Environmental and Social Impacts and Issues						
1.1	Ukrnfata will develop and implement and E&S management systems (part of ESG) that will include internal audits and supervision of the powers sectors. As part of ESG management systems this will include pertinent internal audits to ensure management of ESG issues and data collection and subsequent disclosure and reporting in line with National requirement as well as EU such as CSRD.	Management of corporate ESG, data collection for corporates reporting	National and EU regulations	Own resources and consultants	2026	One year from commissioning as part of independent commissioning audit	
1.2	Implemented integrated management system policies covering ISO 14001 and ISO 450001 standards The ESMS will be integrated into the corporate ESG management systems with appropriate oversight, data verification and internal audits	Optimisation of environmental management though a formalised system.	National and EU regulations	Own resources and consultants	2026	Develop and implement an ESMS Annual ESHS Report to the Bank Written, signed and disclosed Environmental & Social Policy for the CCGT Project	

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1.3	Develop and implement a broad program to adapt to EU requirements, such as CSRD/ESRS reporting. Adoption of this program as a public policy and corporate governance decision	Optimisation of sustainability reporting through a formalised system.	Ukrainian regulations Best practice	Own resources, external consultants	Start implementation in 2026 to be ready to report in line with CSRD from 2027	Preparation of a dedicated report to the Bank on the implementation	

1.4	<p>Develop Construction Environmental and Social Management Plan</p> <p>A Construction Environmental & Social Management Plan (CESMP) will be produced, by the EPC Contractor, reviewed by the Ukrnafta EHS staff, and submitted to the EBRD for approval.</p> <p>The CESMP will reflect the requirements of the ESIA, and will include the following components (as appropriate):</p> <ul style="list-style-type: none"> • Traffic Management Plan, • Noise and Vibration Management Plan; • Soil and Groundwater Management Plan; • Waste Management Plan (including Hazardous and Non-Hazardous waste); • Oil and Chemical Spill Management Plan; • Community Health Management Plan; • Workers' Accommodation Management Plan; • Local Recruitment Plan. • Procurement and Supply Chain Management Plan. • Cultural Heritage Chance Find Procedure; • Contractor Management Plan; and, • Construction Phase Environmental Monitoring Plan. <p>In addition to the above, the CESMP will include documented procedures for the ongoing identification and assessment of any environmental and social risks that may arise during the works.</p>	<p>Ensure that the Environmental and Social risks associated with construction are appropriately managed.</p>	EBRD ESR1	Own resources, external consultants	Before construction is started	Present the documents to the Bank	
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	Ukrnafta shall ensure that the coverage of the CESMP includes the gas pipeline and power line construction.						
1.5	Operational Environmental and Social Management Plan (OESMP) OESMP will be produced, by the EPC Contractor, reviewed by Ukrnafta EHS staff, and submitted to the Lenders' for approval prior to commissioning. The OESMP will reflect the requirements of the ESIA and will include all necessary mitigation, procedures and management resources to address the identified environmental and social issues. In addition, procedures will be included to address unforeseen environmental and social issues.	Ensure that the Environmental and Social risks associated with plant operation are appropriately managed	EBRD ESR1	Own resources, external consultants	Before plant commissioning	Submission of the OESMP to the EBRD	
ESR2	Labour and Working Conditions						
2.1	Update existing Human Resource Policy and related management plans and procedures, covering all employees, contractors and sub-contractors.	Management of labour and working conditions in line with national labour code and EBRD ESR2.	EBRD ESR 2 Voluntary and best practice	Own resources, external consultants Assign responsibilities	Q4 2025	Preparation of a dedicated report to the Bank on the implementation of the System	

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2.2	Develop and implement Worker Grievance Mechanism for Ukrnafta, EPC contractor and subcontractors, also defining the rules for the participation of staff representatives in disputes on these topics.	To provide a channel for raising workers concerns and transparent, consistent mechanism for resolution.	EBRD ESR 2	Own resources, external consultants Assign responsibilities	Q3 2025	Include information in progress report to the Bank	
2.3.	Develop and adopt Corporate Code of Conduct and Ethics covering employees, contractor and security personnel.	Prevention of harassment and abuse of power during project implementation.	EBRD ESR 2, ESR 4	Own resources, external consultants	Q3 2025	Include information in progress report to the Bank	
ESR3	Resource Efficiency and Pollution Prevention and Control						
3.1.	Design and develop the plant in line with Best Available Technologies (“BAT”) and ensure BAT Conclusion are met for the CCGT plant. Undertake an audit within one year of commencing to verify compliance	Ensure compliance with Bank and EU requirements.	ESRS E3 and EU regulations	Design and EPSC contracts	1 year after commissioning	Independent assessment 1 years from commissioning	
3.2.	Install and develop dry cooling systems to ensure BAT compliance and resources efficiency	Ensure water resource management	ESRS E3 and EU regulations	Contractors	1 year from commissioning	Independent assessment	
3.3.	Develop and implement a Continuous Emission Monitoring System (CEMS) compliant with BAT IED/LCP requirements, also taking into account the monitoring of the quality of air supplied to the CCGT.	Improved environmental monitoring	EBRD ESR 3 LCP BAT Conclusions	EPC Contractor & Own resources, external consultants Cost 100.000 Euro	Q1 2027	Include information in AESR	

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3.4	Develop and implement a system for monitoring the quality of sewage, liquid waste and solid waste and their proper disposal - including issues of their qualification in accordance with the regulations	Improved environmental monitoring	EBRD ESR 3 Voluntary and best practice	EPC Contractor & Own resources, external consultants	Q1 2028	Include information in AESR	
3.5	Greenhouse Gas Reporting Greenhouse Gas Emissions shall be quantified annually and reported to the EBRD.	Monitoring of Greenhouse Gas Emissions.	EBRD ESR 3	Own resources, external consultants	Q2 2028	Include information in AESR	
3.6	Historical soil contamination There are areas at the proposed site, where soil contamination is probable. This should be further investigated and once confirmed, remediation should be completed and all Chain of Custody documentation recorded, including licences of contractors involved in the process. Upon completion, verification sampling should be conducted to confirm the standards have been achieved.	To ensure that historic contamination is addressed under full Duty of Care obligations.	EBRD ESR 3	external consultants	Prior to construction	Submission of report summarising the remediation works, including full submission of Chain of Custody documentation	
3.7.	Negotiate an agreement on the principles of temporary parallel operation of the new CCGT facility and the old heating plant so as to ensure uninterrupted supply of heat and energy to the area	Discussion of cooperation with the existing municipal business	Voluntary and best practise	Own resources	Q4 2025	Include information in annual report to the Bank	

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ESR4	Health and Safety						
4.1	Occupational Health & Safety Plan: <ul style="list-style-type: none"> - Develop a Project-specific Occupational Health & Safety Plan (OHSP) for the construction and operational phases, including coverage of sector-specific and general construction and operational risks. 	Minimise injuries/fatalities due to accidents	EBRD ESR 4 IFC Guidelines	Project Company EPC Contractor O&M Contractor	Prior to construction	OHSP	
4.2	Health & Safety System and Performance Monitoring: <ul style="list-style-type: none"> - Ensure the systems and procedures are in place to include periodic safety meetings; work instructions and work permits; - Carry out periodic medical screening of staff to inform occupational health and safety measures and use of generic and specialised PPEs, also in terms of potential risks from the neighbouring plants. 	Optimised health and safety performance Employment of required occupational health and safety measures	EBRD ESR 4 Voluntary and best practice	Own resources, external consultants	Q1 2026	Health & Safety Performance system, Occupational hazards identified and addressed through work place adjustments and PPE, procedures, monitoring, and regular audits are in place.	

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4.3	Traffic Management Plan (TMP): Develop project-specific TMP, describing traffic routes, avoidance of sensitive receptors and transportation rules (schedule, speed, checks, shifts).	Mitigate potential impacts of the works. Minimise injuries/fatalities due to accidents. Public safety and security.	Good practice	Own resources, external consultants	Before construction start	The plan should be agreed with relevant authorities and made publicly available	
4.4	Security Plan: <ul style="list-style-type: none"> - A Security Risk Assessment (SRA) for the construction phase has to be prepared by the EPC contractor and agreed with Ukrnafta and relevant authorities. - Security Plan shall ensure employee, contractor and public safety (including emergency shelters) as well as avoidance of trespassing, theft and malicious damage incidents. - The Security Plan should specifically describe any contract armed personnel to be employed on the Project. 	Mitigate potential security risks.	EBRD ESR4 requirements	Own resources, external consultants	During Project design	Preparation of a dedicated report to the Bank on the implementation of this point	

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4.5	Collect and present a list of all norms, standards and certificates that will be required during the design, construction, ordering of equipment and for environmental protection, health & safety and security of the facility	Optimised health and safety performance	Voluntary and best practise	Own resources, external consultants	Q4 2025	Include the list in reports to EBRD	
ESR5	Land Acquisition, Involuntary Resettlement and Economic Displacement						
5.1	<p>Land acquisition for gas pipeline and power line routing:</p> <ul style="list-style-type: none"> - Prior to the finalisation of the detailed routing of the gas pipeline and power line, undertake an updated survey of the land, current land usage, and any potential for any compensation or economic displacement impacts. This shall include updated consultations as necessary and no-objections from lenders. - No construction can happen outside project site footprint before land acquisition impacts are identified, assessed and compensated. 	Land acquisition impacts are identified and addressed in compliance with national laws and EBRD ESR5,	EBRD ESR 5	Own resources, external consultants	As part of the route selection but prior to construction	Written assessment is provided to the Bank (lenders) for no objection.	

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ESR6	Biodiversity and Living Natural Resources						
6.1	Biodiversity and Living Natural Resources Assessment Biodiversity survey should be conducted to confirm lack of valuable biodiversity features and the scope of trees felling required	The project is located within a brownfield site, but the survey will confirm suitability of the area	EBRD ESR 6	External consultant	During project design preparation	Include information in report to the Bank	
ESR8	Cultural Heritage						
8.1	Chance Find Procedure (CFP): Develop a CFP and undertake a cultural heritage and archaeological assessment for the proposed gas pipeline prior construction as part of the route selection.	To ensure that any archaeological finds will be preserved during construction process	EBRD ESR 8 Voluntary and best practise	Own resources, external consultants	Q4 2025 As part of the route selection but prior to construction	Procedure to be reported to the Bank	
ESR10	Information Disclosure and Stakeholder Engagement						
10.1.	Develop a corporate disclosures and reporting framework and provide key information on corporate actions as well as E&S impacts risks and operations of this plants in line with national and EU requirements (such as CSRD)	Ensure disclosures and reporting at plant and corporates level	Best practice EU law ESR 1 & 10	Own resources, Corporate ESG	One year after commissioning	Report and KPIs disclosed online	

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10.2	<p>Project-specific Stakeholder Engagement Plan (SEP):</p> <ul style="list-style-type: none"> - Develop and implement SEP and grievance procedure for project stakeholders, including targeted engagement methods, electronic means of communication with the public and other stakeholders. <p>Carry out additional public consultation and full ESIA disclosure and update SEP and public consultation summary accordingly, once the Martial Law is lifted. Conduct the consultations under standard conditions, applicable to the situation</p>	Ensure meaningful stakeholder engagement and information disclosure under existing restrictions and martial laws rules.	EBRD ESR 10 Voluntary and best practise	Own resources, external consultants	Q4 2027	<p>Provide information to the Bank</p> <p>Update discloses within 1 years of martial law being lifted</p>	