

Environmental and Social Action Plan – Qair Khobna

No	Action	Environmental and Social Risks (liability & benefits)	Requirements (legislative, ESR , best practices)	Resources, investments, Responsibilities	Timeline	Target and evaluation criteria for successful implementation
ESR1	Assessment and management of environmental and social risks and impacts					
1.1	<p>Develop a clear E&S organizational structure with designated roles, responsibilities, qualified personnel, and adequate human and financial resources to ensure effective and continuous E&S performance.</p> <p>Appoint a qualified Environmental & Social Site Manager to take overall responsibility for compliance with ESIA's, permit requirements, ESAP, SEP, LARF and EBRD requirements related to E&S issues.</p>	All environmental and social issues and impacts are appropriately addressed.	<p>EBRD ESR1 & ESR 10</p> <p>National legal requirements</p> <p>Best practices</p>	Qair	Upon signing the loan agreement with EBRD	<p>Organigram approved and shared with lenders</p> <p>Environmental & Social Manager employed.</p>
1.2	<p>Reporting on E&S performance of the project:</p> <p>Prepare and submit report to EBRD on ESAP's implementation and E&S performance of the project</p>	All environmental and social issues and impacts are appropriately addressed. Performance Reports shared.	<p>EBRD ESR1 & ESR 10</p> <p>National legal requirements</p> <p>Best practices</p>	Qair	<ul style="list-style-type: none"> - Quatrely reports during construction - Annual reports for operational phase 	<p>Reports prepared and submitted to EIB and EBRD</p>
1.3	<p>Commitments, Consents and Permits Registers:</p> <p>Obtain and maintain compliance with all required commitments and permits from appropriate authorities throughout all stages of the project.</p> <p>A database tracking all permits and consents shall be developed and maintained.</p>	Compliance to national regulations and commitments	<p>EBRD ESR1</p> <p>National legal requirements</p>	Qair	Throughout the project development phases. The data base (register should be included in the E&S	<p>Consents and permits obtained</p> <p>Database tracking of all permits and consents developed</p> <p>Compliance monitoring reports</p>

					performance reports)	Reporting to EIB/EBRD
1.4	Develop, implement, and regularly update an Environmental and Social Management Plan (ESMP), proportionate to the Project's risks and impacts. The ESMP shall integrate monitoring systems, define measurable outcomes, performance indicators, grievance mechanisms, corrective and preventative actions, and provide differentiated measures for vulnerable groups, ensuring lessons learned and changes in circumstances are reflected.					
1.5	<p>Establish and maintain a dynamic Environmental and Social Management System (ESMS) appropriate to the Project's nature, scale, and risks. The ESMS shall comply with ESRs and Good International Practice (GIP), include overarching policies defining environmental and social commitments and objectives.</p> <p>Qair has developed an EHSS policy in January 2024 which serves as the guiding framework for all their activities, integrating quality, health, safety and environmental considerations.</p> <p>The policy should be reinforced by operational procedures to be implemented by the projects (identification of risks and impacts, management plans, monitoring and review, stakeholders 'engagement, emergency preparedness and response).</p> <p>ESMP has been prepared in the ESIA. The ESMP is subject to update to consider any change in the project.</p>	All environmental and social issues and impacts are appropriately addressed.	<p>EBRD ESRs</p> <p>National legal requirements</p> <p>Best practices</p>	Qair	Upon signing the loan agreement with EBRD	<p>ESMS prepared and approved</p> <p>Policy disclosed on Qair website</p> <p>ESMP updated if needed</p>
1.6	Contractor ESMP and contractual requirements:	All environmental and social issues	EBRD ESRs	Qair/contractors		Tender documents approved before

	<p>Establish and implement a contractor management plan to ensure that all contractors and subcontractors comply with the ESRs and ESMS/ESMP requirements. This shall include integrating ESMP conditions into contracts, assessing and monitoring contractor performance, ensuring contractors have the necessary knowledge and skills, and applying mitigation or remediation measures in cases of non-compliance.</p> <p>Tender documentation should refer to the need for compliance with all applicable EBRD ESRs, the requirements of this ESAP and findings and recommendations of the ESIA and permits.</p>	<p>and impacts are appropriately addressed during construction phase.</p> <p>Compliance with EBRD, national and EU requirements and Good International Industry Practice.</p>	<p>National legal requirements</p> <p>Best practices</p>			contractualization of the contractor ESMP of the contractor approved before construction
1.7	<p>Enhance and implement a supply chain management system to identify, manage and remediate supply chain risks associated with labour exploitation, as well as any other significant environmental and human rights risks and impacts. The management system should provide for supply chain traceability and labour audits and third-party verification commensurate with the labour risks identified.</p> <p>This shall include due diligence and management procedures for the sourcing of solar modules and solar components in accordance with the EU Guidance on Due Diligence for EU Businesses to Address the Risk of Forced Labour in Their Operations and Supply Chains (2021)¹, as well as relevant Lenders policy or guidelines from time to time adopted by the Lenders.</p>	<p>Risk of child and forced labour in the solar supply chain</p>	<p>Good International Practices</p> <p>EBRD ESR2</p> <p>EU Guidance on Due Diligence for EU Businesses to Address the Risk of Forced Labour in Their Operations and Supply Chains</p> <p>EIB Standard 8</p>	Qair		<p>Evidence of implementation of supply chain management system (due diligence reports, risk assessment, contract clauses, labour audits reports, etc.)</p>

¹ https://trade.ec.europa.eu/doclib/docs/2021/july/tradoc_159709.pdf

	<p>With respect to solar supply chains, the management system will require:</p> <ul style="list-style-type: none"> • Responsible Sourcing Policy • Supplier Code of Conduct • Mapping and risk assessment of solar module and solar component suppliers. • Define specific measures to be implemented in case the mapping reveals potential exposure to forced labour. • Inclusion of appropriate clauses in procurement notices and contracts with solar contractors and suppliers on labour risks and management thereof. • Self-declarations, legal representations/warranties or similar, by solar contractors, suppliers and sub-suppliers regarding labour risks. • Social assessments/labour audits of first tier solar supplier(s) where risks are identified. • Requirements for traceability protocols from solar suppliers down to polysilicon (and metal grade silicon where risks are identified). • When possible, requirements for solar suppliers to conduct (or provide) deep traceability audits of their supply chains. • Requirements for chain-of-custody certification from suppliers. 					
ESR 2	Labour and working conditions					
2.1	<p>Tender documentation requirements Ensure tender documentation for contractors and sub-contractors includes obligations to comply with EBRD ESRs, national labour and OHS legislation, ESAP, findings of the ESIA, permit conditions, and relevant HR, E&S and stakeholder engagement policies.</p>	Compliance with EBRD, national requirements, best available practice.	EBRD ESR2, National labour code and OHS laws, best practices	Qair	During procurement stage	Tender documents include ESR, ESAP, ESIA and HR policy requirements; reviewed and approved by EBRD before contract award.
2.2	<p>Contractors HR Policies Develop and implement HR Policies consistent with ESR2. Policies must prohibit child and</p>	Effective and improved HR & workforce	EBRD ESR2 ILO Core Conventions National labour laws	Qair	Prior to mobilisation of workforce	HR Policy developed, disclosed to all workers, and enforced. Training provided.

	forced labour, and address rights of non-employee workers in line with ILO standards and EBRD requirements.	management. Improved employer-worker relationship Local economic benefits				
2.3	Labour and working conditions Comply with national labour, social security, OHS laws and ILO standards.	Risk of unsafe or unfair working conditions, poor accommodation. Benefits: safer workplace, improved productivity, reduced turnover.	EBRD ESR2 & National labour code and OHS laws IFC/EBRD Workers' Accommodation Guidelines	Qair	Continuous (construction and operation phases)	Compliance audits conducted; non-conformities corrected; Accommodation inspected and certified before occupancy.
2.4	Grievance Mechanism: Develop and implement a grievance mechanism for project's workers (including sub-contractors) aligned with ESR2, ensuring accessibility, transparency, and specific procedures for sensitive issues (GBVH, retaliation). The Grievance Mechanism should allow for anonymous grievance.	Risk of unresolved grievances, labour disputes, GBVH incidents. Benefits: improved trust, reduced conflict, early resolution.	EBRD ESR2 National labour code Best practices (GBVH survivor-centered approach)	Qair	Prior to mobilisation of workforce	Grievance mechanism operational; Register of grievances maintained; Reports submitted to EBRD..
2.5	Use of Local Workforce and Worker influx Adopt a local recruitment strategy (i) advertise jobs locally, (ii) encourage local workforce to apply, and (iii) prioritise hiring of local workforce where reasonable and practical. Prepare a worker influx management plan providing for accommodation arrangement, interaction with project's local workers and surrounding communities.	Risk of community dissatisfaction if jobs bypass locals. Benefits: community support, social license to operate, reduced labour influx risks.	EBRD ESR2 National labour law Best practices	Qair	Throughout recruitment (construction and operation phases)	Evidence of local job postings; % of local workforce hired reported quarterly; Policy included in HR documentation.
ESR 3	Resource efficiency, pollution prevention and control					
3.1	Resource efficiency Assess and monitor use of energy, materials and waste. Apply simple measures to reduce	Risk of wasted resources and higher costs.	EBRD ESR3, national laws, GIP	Qair	From start of construction, updated annually	Resource efficiency plan in place; Records of resource use and waste.

	waste and improve efficiency.	Benefit: savings and lower impacts.				
3.2	<p>Water use Prepare water balance and reduce potable water use. Prefer non-potable sources where possible. Monitor during construction and operation.</p> <p>For solar panel cleaning, a waterless solution must be preferred. If this is not the case, submit to the lenders approval a "best available technology" study comparing waterless and with- water solutions from a technical-economic and E&S perspective: only renewable water sources should be envisaged (not fossil aquifers) and a hydrogeological study and water mass balance should be included to confirm the absence of water use competition with local agricultural or community needs, taking into account climate change.</p>	Risk of overuse of local water. Benefit: protect water resources, avoid conflicts.	EBRD ESR3, Tunisian water law	Qair	Water balance before construction, monitor annually	Water balance approved; Evidence of reduced potable water use.
3.3	<p>Waste management Prepare Waste Management Plan. Minimize, reuse, recycle. Dispose of residual and hazardous waste only via licensed contractors.</p> <p>Require PV panels suppliers to meet the key objectives of EU WEEE directive in terms of collection, treatment, recovery and sound disposal of WEEE at best support efforts, considering the relevant INCOTERM (set of internationally recognized rules which define the responsibilities of the buyers and sellers in the export transaction — defining obligations, costs and risks involved in the delivery of goods):</p> <ul style="list-style-type: none"> • Panels that are delivered broken during the construction period must be disposed in a facility with the technical capacity to recycle their components, at the expense of the supplier. The supplier must provide a proof of 	Risk of pollution, illegal dumping. Benefit: compliance, cleaner site.	EBRD ESR3, national waste law	Qair	Continuous	Waste plan approved; Licensed contractors engaged; Disposal records kept.

	<p>delivery of the broken panels to such facility.</p> <ul style="list-style-type: none"> • Panels that are broken or out of order during construction or operation must be disposed in line with the principles of the WEEE directive at the expense of the supplier. 					
3.4	<p>Pollution prevention</p> <p>Apply measures to avoid dust, spills, and emissions during works. Respect Tunisian and EU standards where relevant. Ensure:</p> <ul style="list-style-type: none"> • Dust suppression measures • Speed restrictions on dirt roads and in the vicinity of agricultural fields and residential dwellings • Regular maintenance of machinery and equipment • Tarpaulin cover for dusty loads • Timely (immediate) restoration of road surfaces in case of damage <p>Preparation and implementation of an oil spill prevention and management procedure/plan.</p>	<p>Risk of air, soil and water pollution. Benefit: better community relations, legal compliance.</p>	EBRD ESR3, national standards	Qair	During construction and operation	Pollution prevention measures in place; Monitoring reports available.
3.5	<p>GHG emissions Estimate and report GHG emissions. Apply reduction measures (efficient equipment, optimized transport). Report annually</p>	<p>Risk: high emissions, climate impacts. Benefit: alignment with EBRD policy.</p>	EBRD ESR3, GHG Protocol	Qair	Baseline before construction, annual reports	GHG report submitted to EBRD; Reduction measures documented.
3.6	<p>Noise and vibration Monitor noise from machinery, transport, and transformers. Apply mitigation (scheduling, barriers) if levels exceed limits.</p>	<p>Risk: nuisance for workers and communities. Benefit: fewer complaints, legal compliance.</p>	EBRD ESR3, Tunisian standards	Qair	Before and during construction and operation	Noise levels monitored and compliant; Mitigation actions implemented.
3.7	<p>Ban the use of herbicides or pesticides during the construction, in particular for vegetation control</p>	Pollution control	EBRD ESR3 EIB Standard 3	Qair	During construction	No use of pesticides / herbicides. Ban included in sub-contractors' contracts
3.8	<p>Hazardous materials Manage hazardous</p>	Risks: spills, fires,	EBRD ESR4, Tunisian	Qair, EPC	Continuous	Hazardous materials

	materials safely (storage, labelling, transport, disposal). Apply risk controls and safe handling practices. Ensure emergency procedures are in place.	pollution, worker/community exposure. Benefits: reduced incidents, legal compliance.	laws, GIP	Contractor		register kept; Licensed disposal contractors engaged; Emergency response drills carried out.
ESR 4	Health, Safety and Security					
4.1	<p>Worker health & safety Identify and assess workplace hazards. Implement preventive and corrective measures in line with EU standards and GIP. Train and supervise workers, ensure PPE use, and allow stop-work authority. Include OSH in ESMS. This should include as a minimum:</p> <ul style="list-style-type: none"> • Job- and task-specific risk assessment and required general control measures for all jobs/activities • Provision of personal protection equipment (PPE), requirements for use of PPE, and enforcement of PPE use • Provision of other safety equipment as needed. • Safety training for all personnel in accessible language(s), covering hazards and safety protocols of their jobs • Special training for hazardous work (confined spaces, working at heights, working with electricity, etc.) • Recording incident statistics, including (at a minimum) total work hours, lost time incidents, major injuries, fatalities, etc. • Reporting incidents and OHS statistics. 	Risks: accidents, injuries, reputational damage. Benefits: safer work environment, legal compliance.	EBRD ESR4, Tunisian OHS law, EU standards	Qair	Continuous (design, construction, operation, decommissioning)	Risk assessments completed; OSH plan in place; Safety audits carried out.
4.2	<p>Community health & safety Identify and manage risks to local communities (traffic, construction works, communicable diseases, natural hazards). Implement prevention and emergency preparedness measures. Engage local authorities and communicate with communities. This should include as a minimum:</p> <ul style="list-style-type: none"> • Provision of construction schedule and 	Risks: accidents, health impacts, loss of community trust. Benefits: safer communities, improved relations.	EBRD ESR4, Tunisian regulations	Qair	Before and during construction and operation	Traffic management plan, emergency plan and awareness sessions delivered to communities.

	<p>description of community risks to the governorates and communities</p> <ul style="list-style-type: none"> • Installation of fences and safety and danger warning signage at the construction sites and operational sites • Disease control and prevention • Prevention and control of tensions and conflict between the labour force and communities, including Gender-Based Violence and Harassment • Emergency drills involving the communities 					
4.3	<p>GBVH / SEAH prevention Enforce zero tolerance for GBVH, harassment, and child abuse. Adopt and train on Codes of Conduct for all workers and security staff. Provide confidential reporting channels and survivor-centred support.</p>	<p>Risks: GBVH incidents, reputational/legal impacts. Benefits: safer environment for workers and communities, compliance.</p>	<p>EBRD ESR4, ILO conventions, GBVH best practices</p>	<p>Qair</p>	<p>Before mobilisation; monitored continuously</p>	<p>Code of Conduct signed; GBVH trainings delivered; Grievance mechanism includes GBVH cases.</p>
4.4	<p>Worker welfare & accommodation Provide safe, hygienic, and gender-appropriate welfare facilities and accommodation (if used). Ensure proper maintenance, non-discrimination, and safeguards against GBVH. Ensure that worker accommodation complies with the IFC/EBRD corresponding guidance note (2009)²</p>	<p>Risks: poor living conditions, health risks, GBVH. Benefits: better worker wellbeing, community trust, compliance.</p>	<p>EBRD ESR4, IFC/EBRD Workers' Accommodation Guidelines</p>	<p>Qair</p>	<p>Before worker mobilisation; maintained during construction</p>	<p>Welfare facilities inspected and approved; Worker satisfaction monitored.</p>
4.5	<p>The Developer to design and implement a Security Personnel Management Plan and Security Personnel Code of Conduct. This should include the following:</p> <ul style="list-style-type: none"> • A risk assessment for the use of privately contracted security personnel and local people employed to act as security personnel • A risk assessment associated with the involvement of government-provided 	<p>Security Personnel</p>	<p>EBRD ESR4</p>	<p>Qair</p>	<p>1 month after the start of construction</p>	<p>Plan prepared, incidents reported to lenders</p>

²<https://www.ifc.org/content/dam/ifc/doc/mgrt/workers-accomodation.pdf>

	<p>security personnel who may be asked to provide support during an incident, if this occurs.</p> <ul style="list-style-type: none"> • The controls on security personnel, including the use of force, and mandatory screening and training requirements. • Vetting procedure to ensure that all security personnel (including local people to act in this capacity) involved have not been implicated in past human rights abuses. • Required training and certifications. <p>The Plan shall be cascaded as appropriate to the EPC contract.</p>					
4.6	<p>Minimize the risk of serious consequences from snake bite or scorpion sting:</p> <ul style="list-style-type: none"> • Train workers regarding snake/scorpion risks, preventive measures when working on the field, behaviour in case of snake/scorpion encounter, behaviour if victim or witness of a snake bite / scorpion sting (at induction during construction, annually during operation). <p>Allow access to the site only to personnel / workers with ankle-high shoes or boots.</p> <ul style="list-style-type: none"> • Do not allow personnel / workers working alone inside the PV land plot. • Annually check the closest medical centres with available antivenom. Make their contact and address readily accessible at the PV plant office. • Annually check with a specialized doctor the above-listed snake bite / scorpion sting management procedures, and improve them if needed. 	Worker H&S	EBRD ESR4	Qair	During construction	Measures in place, incidents reported to lenders
4.7	<p>Construction activities during summer should be avoided to the extent possible, and a specific work schedule should be agreed during the hottest periods.</p>	Worker H&S	EBRD ESR4	Qair	During construction	Incidents reported to lenders

	Construction Contractor to monitor heat-related incidents and ensure that workers in the warm season are provided with shaded places to rest/eat, appropriate duration of breaks and with sufficient cold drinking water.					
ESR 5	Land acquisition, restrictions on land use and involuntary resettlement.					
5.1	Develop and implement the Land Acquisition and Livelihood Restoration Plan (LARP) based on the prepared and disclosed Land Acquisition and Livelihood Restoration Framework (LARF).	Compliance with EBRD requirements Compensation for economic displacement and livelihood impacts related to land acquisition, and access restrictions.	EBRD ESR5 National requirements	Qair	Before Construction Phase (i.e. no land is accessed for works until compensation payments received by the eligible entitled parties).	Submit LARP to EBRD for review and approval. Report on the LARP's implementation.
5.2	Ensure that the LARP is audited after completion, with compensation fully disbursed and livelihood restoration measures monitored and deemed meeting ESR5.	Compliance with EBRD requirements Compensation for economic displacement and livelihood impacts related to land acquisition, and access restrictions.	EBRD ESR5	Qair	3 months after LARLP completion	Audit report submitted to Lenders
ESR 6	Biodiversity conservation & sustainable management of living natural resources.					
6.1	Additional biodiversity survey and reports: Within the project's area of influence, site visits	Identification of impacts on flora	EBRD ESR6, EIB Standard 4	Qair, with external biodiversity consultant	Before board approval	Completed biodiversity surveys and reports. ESIA updated with these

	<p>already conducted in April, May, June, July, August, and September.</p> <p>Engagement and coordination efforts with STEG and the other developers in the area to reduce pressure on biodiversity in the region</p> <p>Reports to be developed by the project:</p> <ul style="list-style-type: none"> - The biodiversity report covering July, August and September with a clear confirmation that the project is not likely to have a significant impact on the conservation objectives of the two protected sites (Parc Jebel Bouhedma and sebkhat Naouel) - The Critical Habitat assessment which shall be compliant with EIB criteria for Critical Habitat (guidance note of 2018 https://www.eib.org/en/publications/guidance-note-on-biodiversity-and-ecosystems). 	and fauna in the Project area.	National Requirements			elements BMP implemented
6.2	<p>The Developer shall prepare and cause the contractor to implement a Biodiversity Management Plan “BMP” covering construction and operation, including a section addressing the management of cumulative biodiversity impacts</p> <p>Engagement with local BirdLife partner in required to inform on appropriate mitigations measures for the preparation and implementation of BMP.</p>	Minimisation of impacts on fauna and flora	EBRD ESR6, EIB Standard 4	Qair, with external biodiversity consultant	Before the beginning of the construction	Plan prepared

	Engagement and coordination efforts with STEG and the other developers in the area to reduce pressure on biodiversity in the region					
6.3	Developer shall contractually require EPC Contractors to install Bird Flight Diverters (BFD), following industry standard designs and spacing, on the entire length of the line. Model should be selected in order to reduce impact on the Priority Biodiversity Features identified on site	Minimisation of impacts on avifauna	EBRD ESR6, EIB Standard 4	Qair, EPC Contractor	During design phase of the line	Final design updated
6.4	Coordinate with STEG to Conduct a 3-year bird mortality monitoring program at the beginning operational phase, especially during the nesting and migration seasons. The monitoring program shall then be carried out every 5 years. Based on the findings of the monitoring, revise and update the operational Biodiversity Management Plan, including additional mitigation measures if needed to ensure the applicable conservation objectives.	Minimisation of impacts on avifauna	EBRD ESR6, EIB Standard 4	Qair, in coordination with STEG	During line operation	Evidence of programme implementation in reporting to Lenders
6.5	The PV site fencing shall allow for reptile passage.	Ecological Continuity	EBRD ESR6, EIB Standard 4	Qair, EPC Contractor	During design of the PV site	Final design updated
6.6	Avoid permanent lighting of the PV site during construction or operation, to avoid night habitat disturbance. Where night light is needed for safety / security reasons, use low intensity lights directed to the ground, controlled by presence detectors and a time- switch.	Minimisation of impacts on fauna	EBRD ESR6, EIB Standard 4	Qair, EPC Contractor	During construction and operation	

6.7	Should any impact on Priority Biodiversity Features be identified during the project implementation, appropriate offset needs to be developed in close coordination with Birdlife and project developer in the region to ensure No Net loss on this species.	Not Net loss requirement on PBF	EBRD ESR6, EIB Standard 4	Qair, EPC Contractor	Throughout implementation of the project	Impact on PBF reported to Lender, offset developed and implemented if needed
ESR 8	Cultural heritage.					
8.1	Chance Finds Procedure: Establish and implement a Chance Finds Procedure during construction. Notify Ministry of Culture (or relevant authority) prior to excavation. Train workers to stop works if artefacts are found and secure the site until assessment is done.	Risk: accidental damage to cultural heritage. Benefit: compliance with law, protection of heritage, reduced reputational risks.	EBRD ESR8 Tunisian heritage law		Before start of works and throughout construction	Chance Finds Procedure in place; Workers trained; Any finds reported and managed with authorities.
ESR 10	Stakeholder engagement and information disclosure					
10.1	Stakeholder list update Keep the stakeholder register updated, including vulnerable groups and local representatives.	Risk: exclusion of stakeholders, conflicts. Benefit: inclusive engagement and stronger local support.	EBRD ESR10,	Qair	Update annually or when changes occur	Updated stakeholder list documented.
10.2	Implementation of SEP Apply the approved SEP (consultations, disclosure, engagement with vulnerable groups). Ensure consistent follow-up with communities and authorities.	Risk: poor engagement, reputational risks. Benefit: trust, transparency, compliance.	EBRD ESR10, approved SEP	Qair	Continuous during project lifecycle	Evidence of consultations and disclosure as per SEP. Consultations reported to EBRD.
10.3	Information disclosure Share project documents (NTS, SEP, ESIA, LARF) and updates in accessible formats and languages.	Risk: misinformation, rumours. Benefit: informed stakeholders and fewer disputes.	EBRD ESR10, SEP	Qair	Continuous	Information disclosed through online channels, meetings, posters.
10.4	Grievance mechanism Maintain accessible grievance mechanism, including options for anonymous and sensitive complaints (e.g., GBVH). Track and resolve	Risk: unresolved grievances, escalation. Benefit: early resolution, improved relations.	EBRD ESR10, SEP, GBVH best practice	Qair	Operational before construction; maintained during project	Functional GM with register and timely resolution of complaints.

	complaints promptly.					
10.5	Monitoring & reporting Monitor effectiveness of engagement and grievance mechanism, analyse trends, and adjust measures. Report outcomes annually to EBRD.	Risk: weak engagement quality. Benefit: continuous improvement, accountability.	EBRD ESR10, SEP	Qair	Annual review	Annual monitoring report submitted to EBRD; Adjustments documented.