

ENVIRONMENTAL AND SOCIAL ACTION PLAN – ERDENE ESIA

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
PR1	Assessment and Management of Environmental and Social Impacts and Issues						
1.1	Recruit and maintain sufficient technical staff to implement the Management Plans drafted as part of the ESIA process and the updates to the plans that will occur during the change from construction to operation of the Project.	Effective management and implementation of the plans is key to managing risk,	PR1	Internal	As required	Reporting in the Annual Environmental and Social Report to the Bank.	

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1.2	Review the Environmental and Social Management Plans and Monitoring Plans throughout the construction phase in preparation for the operational phase.	This will ensure that the various plans remain relevant to the risk exposure.	PR1	Internal	On-going but key timing is immediately prior to implementation of the operational phase.	Reporting in the Annual Environmental and Social Report to the Bank.	

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1.3	Prior to the commencement of the operational phase, develop a Management of Change process that will enable the Project to adapt and change the Management and Monitoring Plans to address any changes in the risk profile and engage with stakeholders appropriately as part of that process.	Enable effective changes to the Risk Management Framework as the risk profile of the Project evolves.	PR1	Internal	Prior to operational phase.	Reporting in the Annual Environmental and Social Report to the Bank.	

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PR2	Labour and Working Conditions						
2.1	Review and revise as needed the company's employee complaints mechanism. Ensure that the mechanism is fit for managing allegations of Gender Based Violence and Harassment (GBVH), including anonymous and same-sex reporting channels.	Ensure workplace grievances are managed effectively Develop a culture and appropriate channels that promote prompt and effective reporting and handling of allegations of GBVH	PR2 National Legislation	Internal or Consultant	Prior to construction works	Mechanism in place with fit-for-purpose grievance transmission mechanisms and effectively communicated to the workforce	
2.2	Review and revise the employee Code of Conduct to include specific requirements related to GBVH.	Ensure that employees are aware of company policy and sanctions in relation to GBVH	PR2 National Legislation	Internal	Prior to construction works	Code of Conduct in place and communicated to employees as part of induction training	

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PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement						
5.1	Extend the 2019 land-use and livelihoods survey to cover any additional herders who use land in the project impact zones and did not previously participate in the surveys.	Ensure assessment of all potentially affected people and livelihoods activities	PR5	Consultant	Prior to construction works	Survey results as appendix to Land Use and Livelihoods Management Plan	
5.2	Develop and implement a Land Use and Livelihoods Management Plan (LULMP) building on the disclosed Framework document.	Ensure restoration of any affected livelihoods activities	PR5	Internal	Prior to construction works	LULMP provided to EBRD for non-objection	
PR8	Cultural Heritage						
8.1	Develop and implement a Chance Finds Procedure.	Ensure effective protection of tangible cultural heritage	PR8 National Legislation	Internal or Consultant	Prior to construction works	Chance Finds Procedure in place and	

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PR10	Information Disclosure and Stakeholder Engagement						
10.1	In collaboration with local stakeholders, further detail the Local Cooperation Management Plan for the construction and operations phases of the project.	Ensure that the project contributes to community development priorities in a manner that is sustainable post-closure	PR10 IFC Strategic Community Investment Handbook	Internal	Prior to construction works	Plan developed and implemented in collaboration with local stakeholders	