

ESAP Item 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						
PS1	Assessment and Management of Environmental and Social Risks and Impacts						
1.1	<p>Environmental & Social Policy The Project Company, ACWA Power Zarqa, shall establish an overarching Environmental & Social Policy based upon that of ACWA Power's internal policy and in line with Lenders requirements, defining the E&S objectives and principles that will guide the project to achieve sound performance.</p> <p>The Policy shall be produced and adopted prior to construction and shall be based on Good International Industry Practice and Lender's Requirements. Furthermore, the Project Supply Chain, including the EPC Contractor and sub-contractors, shall also be provided with a copy of the Policy which will be adopted throughout the Project.</p>	<p>Ensure that Environmental & Social objective and principles that will guide the Project to achieve sound performance are established in writing.</p> <p>The Policy shall then be communicated at Project Company, EPC and O&M levels.</p>	EBRD PR1 IFC PS1	Project Company Time and E&S Expertise	30 August 2016	Written, Signed and Disclosed Environmental & Social Policy	
1.2	<p>Environmental & Social Management System (ESMS) The Project Company, ACWA Power Zarqa shall develop, implement and maintain a Project-specific Environmental and Social Management System (ESMS), based upon ACWA Power ESMS, aligned with the requirements of the ISO 14001 and OHSAS 18001 standards.</p> <p>The EMS will also include elements of SA 8000</p> <p>As part of the ESMS development, clearly define reporting structures and responsibilities and monitoring, reporting and review procedures for the Project. Including means for coordination with Project Stakeholders.</p>	<p>The ESMS for the project is still at a relatively early stage of development. Developing and implementing the system in full will help ensure project related impacts and benefits are appropriately managed.</p>	EBRD PR1 IFC PS1 Best Practice	Project Company Time and E&S Expertise	30 September 2016	Written Environmental, Social and Health & Safety Management System	
1.3	<p>Certification of Operational ESMS Following commissioning of the Project (Combined Cycle Gas Turbine Phase), the Project Company and Operations & Maintenance (O&M) Contractor shall submit the ESMS for certification.</p>	<p>The certification of the ESMS will assist in ensuring that the long-term operational impacts of the Project are managed in a proactive manner.</p>	EBRD PR1 IFC PS1 Best practice	Project Company Time and E&S Expertise O&M Contractor	Within 2 Years' of Operation	Certification of ESMS to the following: ISO14001 OHSAS 18001 ISO 50001	

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1.4	<p>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 Project Company EHS staff, and submitted to the Lenders' for approval.</p> <p>The CESMP will reflect the requirements of the updated ESIA, particularly Volumes 2 and 3, and will include the following components:</p> <ul style="list-style-type: none"> • Dust Management Plan; • Traffic Management Plan, • Noise and Vibration Management Plan; • Soil and Groundwater Management Plan; • Waste Management Plan (including <i>Hazardous</i> and <i>Non-Hazardous</i> waste); • Oil and Chemical Spill Contingency Management Plan; • Community Health Management Plan; • Workers' Accommodation Management Plan; • Local Recruitment and Procurement Plan; • Influx 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 course of works.</p> <p>The CESMP should also include provisions for managing potential risks attached to Associated Facilities and development work, such as the gas supply pipeline and water distribution works by Water Authority of Jordan (WAJ).</p> <p>This will therefore need to be developed / communicated in conjunction with NEPCO and WAJ.</p> <p>The Project Company shall ensure that the coverage of the CESMP includes the Associated Facilities, and work with the implementing Authorities to ensure that the CESMP is effectively applied. This includes the <i>Chance Find Procedure</i> and <i>Traffic Management Plans</i>.</p>	Ensure that the Environmental and Social risks associated with construction are appropriately managed.	EBRD PR 1 IFC PS1	Company Time and E&S Expertise	30 September 2016	Written submission of CESMP to Lenders for approval prior to commencement of Construction works.	

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1.5	<p>Operational Environmental and Social Management Plan (OESMP) An Operational Environmental & Social Management Plan (OESMP) will be produced, by the Operations & Maintenance (O&M) Contractor, reviewed by Project Company EHS staff, and submitted to the Lenders' for approval in advance of construction works.</p> <p>The OESMP will reflect the requirements of the ESIA, particularly Volume 2 and 3, and will include all necessary mitigation, procedures and management resources to address the identified environmental and social issues through the Project supply chain. In addition, procedures will be included to address unforeseen environmental and social issues.</p>	Ensure that the Environmental and Social risks associated with operation are appropriately managed.	EBRD PR 1 IFC PS1	Company Time and E&S Expertise	30 Days Prior to Operation of Simple-Cycle or Based on Current Program: 30 November 2017	Written submission of OESMP to Lenders for approval prior to commencement of Construction works.	
1.6	<p>Lenders' Independent Auditor</p> <p>The Project Company shall instruct <i>Lenders' Independent Auditor</i> to undertake reviews at key-project milestones / deliverables, reporting direct to the Lender. Such audits / reviews will include:</p> <ul style="list-style-type: none"> • Review of ambient noise monitoring plan and reporting (see ESAP Item 1.7 – 1.9); • Review of Construction Environmental and Social Management Plan (ESAP Item 1.4); • Review of Operational Environmental and Social Management Plan (ESAP Item 1.5); and, • Site visits to review implementation of Project procedures. 	Monitor Environmental and Social Performance throughout Project.	Best Practice	Company Investment	30 August 2016	Project Company to submit details of proposed Lenders' Independent Auditor, for the approval of the Lenders, prior to instruction.	

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1.7	<p>Ambient Noise Monitoring Building on the current ambient noise monitoring data presented in the updated ESIA, impact assessment and mitigation, it is proposed to undertake follow-up ambient noise monitoring, pre-construction, as an additional verification exercise.</p> <p>This shall include :</p> <p>(i) collection of ambient noise data at additional receptor locations over extended monitoring periods – a minimum of 5 day duration of continuous monitoring, including the weekend.</p> <p>(ii) verification of the derivation of ambient noise driven thresholds (i.e. where World Bank Group thresholds are exceeded by ambient noise, the Project should not result in greater than 3dB additional noise).</p> <p>Prior to implementation, a written noise monitoring methodology shall be submitted to the Lenders for approval.</p>	Refinement of the noise impact assessment performed within the ESIA and verification of the scale of potential operational impacts.	EBRD PR1 IFC PS1	Company Time & Expertise, supported by specialist consultancies as required.	30 August 2016	Submission of written monitoring proposals to Lenders for approval prior to implementation.	
1.8	<p>Supplemental Noise Monitoring Report Upon completion of the follow-up ambient noise monitoring, a written report shall be produced to confirm whether any amendments / refinement of the proposed mitigation is necessary.</p> <p>Based on the current information, it is anticipated that a minimum of six (6 no.) properties may be exposed to night-time noise impacts in breach of World Bank Group guidelines.</p> <p>In addition to assessing the impact arising solely from the Project, the updated report shall examine the cumulative noise impacts, taking into account the updated baseline together with the Project noise emissions. Where necessary, this will include update noise modelling.</p> <p>Where exceedances of thresholds are anticipated, the project shall provide a preferred technically and commercially viable solution for mitigation – if demonstrated to be required by operational monitoring (see ESAP 1.9).</p>	Refinement of the noise impact assessment and verification of the scale of potential operational impacts.	EBRD PR1 IFC PS1	Company Time & Expertise, supported by specialist consultancies – acceptable to Lenders - as required.	30 September 2016	Submission of <i>Supplemental Noise Monitoring Report</i> to Lenders for review.	

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1.9	<p>Operational Noise Monitoring Written methodologies for Operational Noise Monitoring shall be developed for Lender review and approval, prior to implementation. The duration and scale of operational monitoring, together with the frequency of reporting, shall be commensurate with the findings of the Supplemental Noise Monitoring Report (ESAP 1.8), and subject to approval by the Lenders.</p>	Refinement of the noise impact assessment, verification of the scale of potential operational impacts, and improvement of the noise mitigation measures.	EBRD PR1 IFC PS1	Company Time & Expertise, supported by specialist consultancies – acceptable to Lenders - as required.	Methodology 3 Months Prior to Operation of Simple Cycle Delivery of ongoing operational Noise Monitoring at a frequency in line with proposed Methodology.	Submission of <i>Operational Noise Monitoring Methodology</i> to Lenders. Submission of reports to Lenders on schedule and in a mutually agreed format and frequency, with agreed supporting documentation	
PR2 PS2	Labour and Working Conditions						
2.1	<p>Human Resource Policies & Management System The Project Company shall develop , adopt and implement a <i>Human Resource Policy</i> and <i>Human Resource Management System</i> covering all employees, contractors (EPC and O&M) and sub-contractors. The policy to provide for oversight of contractor policies/procedures. Access by all workers to policy/procedures in their language.</p>	To ensure management of workforce in line with EBRD and IFC requirements including prevention of child labour, forced labour, tolerance of workers associations, rethrenchment principles and encouragement of non-discrimination.	EBRD PR 2 IFC PS 2	Project Company	30 September 2016	Submission of Approved Written Policies/Procedures to Lenders.	
2.2	<p>Worker Accommodation, Code of Conduct and Auditing Document the Project Company's labour accommodation strategy and principles. Check proposed accommodation against the strategy and update any plans if needed. In developing the accommodation: <ul style="list-style-type: none"> ■ The local authorities and communities should be consulted regarding the location of any camp. ■ Establish a <i>Code of Conduct</i> for workers at the camp. ■ Camp should be designed and operated to meet EBRD/IFC Workers' accommodation: processes and standards. This shall be verified via a specific and independent audit as part of the wider <i>Construction Environmental & Social Monitoring Plan</i> (ESAP Item 1.4), prior to occupation. </p>	To standardise accommodation provided to workers employed by the Project Company and contractors.	EBRD PR 2 IFC PS 2	Project Company EPC	Prior to Occupation of Accommodation	Labour accommodation strategy documented and cascaded to contractors Any worker accommodation compliant with EBRD PR 2, IFC PS2. A written statement by an Independent Auditor to verify that the camp design accords with Lender Requirements.	

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2.3	<p>Grievance Mechanism</p> <p>Maintain formal grievance mechanisms for the Project Company, EPC and O&M employees and contractors and disseminate information about its uses to the workforce.</p>	To provide a channel for raising workers concerns and transparent, consistent mechanism for resolution.	EBRD PR 2 IFC PS 2	Project Company, EPC and O&M	01 September 2016	Development and adoption of workers grievance mechanism. Quarterly report on grievances and resolutions.	
PR3 PS3	Resource Efficiency and Pollution Prevention and Control Resource Efficiency and Pollution Prevention						
3.1	<p>LDO-Firing</p> <p>Sulphur content of LDO will be below 1%, this will be verified on an ongoing basis including as part of ISO 50001 audits</p> <p>In order to inform the Lenders of the ongoing risks, the Project Company shall :</p> <p>(i) provide written notification of when the Plant exceeds 500 hours of LDO-firing in any given 12 calendar month period, commencing 01 January each year; and,</p> <p>(ii) provide written notification to the Lenders when LDO received exceeds 0.9% sulphur. Details shall include the source, volume and storage arrangements.</p> <p>In the event of any of the above scenarios, the Project Company shall work with the authorities in order to ensure, as far as practicable, that a long-term supply of LDO <0.9% sulphur can be secured for the Project.</p>	<p>To provide ongoing transparency and notification of stakeholders of the potential risk.</p> <p>There is considered to be a low risk that: (a) LDO supplied to the project will not comply with the 1% sulphur limit, applicable when LDO-firing >500 hours annually; and, (b) when LDO-firing of fuel with >0.9% sulphur, there is projected marginal exceedance of 1 Hour limit should it coincide with unfavourable dispersion conditions</p>	EBRD PR3 IFC PS3	Project Company O&M Contractor	Notification within 10 working days, throughout the operational period.	Ongoing monitoring of LDO Written notification to the Lenders of any breach	
3.2	<p>Greenhouse Gas Reporting</p> <p>Greenhouse Gas Emissions shall be quantified annually in accordance with internationally recognised methodologies and good practice and reported to the Lenders.</p>	Monitoring of operational impacts associated with Greenhouse Gas Emissions.	EBRD PR3 IFC PS3	Project Company	Annually throughout Operational Phase	Submission of Reports Annually	

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3.3	<p>Continuous Emissions Monitoring System (CEMS)</p> <p>As part of the Project commissioning, the CEMS shall be calibrated, certified and emissions confirmed as being aligned with the design – and also, in compliance with the requirements of the EU Large Combustion Plan BREF at that of <i>Best Available Techniques</i> (BAT).</p> <p>Annual calibration of the CEMS shall also include regular emissions compliance verification.</p>	To ensure that the Project emissions remain in compliance with Lender Requirements and do not present an unacceptable impact on air quality.	EBRD PR3 IFC PS3	Project Company	Initial Calibration and Commissioning of CEMS completed during Project Commissioning Ongoing annual calibration and compliance reporting throughout the Operational Phase	Submission of Commissioning Report and Annual Calibration/Compliance Reports	
3.4	<p>Emission limits of Annex V of IED</p> <p>Under normal operation and at >70% load, the Plant shall comply with the following emission thresholds:</p> <p>NOx: 50 mg/Nm³ CO: 100 mg/Nm³ Dust (PM₁₀): 50 mg/Nm³</p> <p>Emission limit values calculated at a temperature of 273,15K, a pressure of 101,3kPa and - after correction for the water vapour content of the waste gases - a standardised O₂ content of 15%.</p>	To ensure that the Project emissions remain in compliance with Lender Requirements and do not present an unacceptable impact on air quality.	EBRD PR3 IFC PR3	Project Company	Throughout Operation Phase	Average emission provided to Lenders in annual report, Any exceedance to be notified in writing to Lenders	
3.5	<p>Historical Soil Contamination</p> <p>Localised and shallow soil contamination is present on site, principally associated with heavy metals. Upon granting of a permit by the Authorities (application pending), remediation shall be completed and all Chain of Custody documentation recorded, including demonstrating the use of licenced and authorised haulage and disposal Contractors.</p> <p>Upon completion of works, further sampling and analysis of soils shall be completed to validate the remediation.</p>	To ensure that historic contamination is addressed under full Duty of Care obligations.	EBRD PR3 IFC PR3	Project Company CEGCO	31 August 2016	Submission of report summarising the completion of the remediation works, including full submission of Chain of Custody	
PR4 PS4	Health and Safety Community Health, Safety, and Security						
4.1	<p>Occupational Health & Safety Plan</p> <p>Develop a Project-specific Occupational Health & Safety Plans (OHSP) for the project construction and operational phases, including coverage of sector-specific and general risks provided under World Bank Group EHS Guidelines.</p>	Minimise injuries/fatalities due to accidents.	IFC General EHS Guidelines (2007) IFC Guidelines for Thermal Power (2008)	Project Company EPC Contractor O&M Contractor	Prior to full Construction, with review and conversion to Operational Plan prior to Operational Phase	OHSP includes procedures formalised health and safety management systems.	

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4.2	<p>Health & Safety System and Performance Monitoring Ensure Health and Safety Performance systems and procedures are in place to include: periodic safety meetings; Organizational Health and Safety Performance data is compared with released industry-specific data; and Health and Safety Performance Monitoring.</p>	Optimised health and safety performance.	<p>IFC General EHS Guidelines (2007)</p> <p>IFC Guidelines for Thermal Power (2008)</p>	Project Company EPC Contractor O&M Contractor	30 September 2016	Health and Safety Performance systems, procedures, monitoring, and regular audits are in place.	
4.3	<p>Traffic Management Plan Ensure formal access and traffic safety plans are in place and agreed with the relevant authorities to include measures for traffic safety and public access. Site access roads shall be gated during the construction period only, to ensure public safety.</p> <p>This should include – as far as reasonably practicable - the proposed water pipeline works by WAJ and gas fuel supply pipeline by NEPCO.</p>	<p>Mitigate potential impacts on the highway network.</p> <p>Minimise injuries/fatalities due to accidents.</p> <p>Public safety and security.</p>	IFC General EHS Guidelines (2007)	Project Company EPC Contractor O&M Contractor	30 September 2016	The following plans are available and agreed with relevant authorities: Traffic Safety plan; Public Access Management plan.	
4.4	<p>Emergency Preparedness and Response Plan (EPRP) Project specific Emergency Preparedness and Response Plan should include the guidance in the IFC standards and take into consideration the existing Hussein Thermal Power Station EPRP for the historical operations, and also, the scheduled decommissioning.</p>	Minimise injuries/fatalities due to accidents	IFC PS4 EBRD PR4	Project Company EPC Contractor O&M Contractor	<p>Construction Phase Plan completed by 30 September 2016</p> <p>Operational Phase update completed prior to Operation.</p>	Submission of <i>Emergency Preparedness and Response Plan</i> for Lenders review.	

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4.5	<p>Security Plan</p> <p>A Security Risk Assessment (SRA) for the construction phase has prepared by the EPC contractor. A SRA for the operational phase should be carried by O&M contractor.</p> <p>Both SRAs shall ensure employee, contractor and public safety as well as to avoid trespassing incidents, theft and malicious damage.</p> <p>The SRAs should specifically describe any contract armed personnel to be employed on the Project.</p> <p>This SRA should include a description of the rules of intervention of public security forces and any memorandum of understanding that provide the framework of their intervention.</p> <p>Based on the outcomes of the SRA, the EPC and O&M Contractors will prepare <i>Security Plans</i> in line with IFC PS4 / EBRD PR4 requirements. The Security Plans will be reviewed by the Project Company EHS staff before being submitted to the Lenders.</p>	Mitigate potential security risks.	IFC PS4 EBRD PR4	Project Company EPC Contractor O&M Contractor	Construction Phase Plan completed by 30 September 2016 Operational Phase update completed prior to Operation.	Submission of Construction Phase Security Plan, including Security Risk Assessments, to the Lenders. Submission of Operational Phase Security Plan, including Security Risk Assessments, to the Lenders.	
4.6	<p>Additional Consultation following finalization of Worker Accommodation and Gas Pipeline</p> <p>In relation to the Worker's Camp and Gas Pipeline Route, undertake further consultations once the designs are finalised.</p> <p>This consultation is also required under the Project <i>Stakeholder Engagement Plan</i> (see ESAP Item 10.1), and shall provide a forum for collecting affected stakeholders views and ensure that they are suitably reflected in the design and implementation arrangements for these works.</p> <p>In relation to the Worker Accommodation, once the detail of the construction staffing, such as composition of required workforce, is known and the accommodation plans finalised, undertake a comparative assessment of the anticipated influx relative to local populations/residents within a 500m and 1,000m perimeter of the site and/or accommodation camps.</p> <p>The findings should be integrated into the SEP implementation and monitoring.</p>	To ensure compliance with PR4/ PS4 and support informed social impact monitoring.	EBRD PR 4 IFC PS 4	Project Company with assistance from external consultants as necessary.	Prior to construction commencement	Evidence provided to Lenders that the survey has been completed including methodology employed. Specific measures for vulnerable groups included in the ESMS and supporting plans.	

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PR5 PS5	Land Acquisition, Involuntary Resettlement and Economic Displacement Land Acquisition and Involuntary Resettlement						
5.1	<p>Supervision of Implementation of Gas Pipeline Route and, if necessary, Transmission Tower Relocation</p> <p>Prior to the finalisation of the detailed routing of the gas pipework, and for the movement of the overhead line transmission towers (if required), undertake an updated site survey of the land, current land usage, and any potential for any severance or economic displacement. This shall include updated consultations as necessary.</p> <p>This shall re-confirm, in a written summary, the current position that specific actions for PS5/PR5 are not required.</p> <p>If PR5/PS5 issues are identified, then a specific action plan shall be confirmed with the Lenders.</p>	<p>It has been demonstrated that no new land acquisition will be required, and NEPCO have confirmed this, verified by developer consultant support, including a site survey of the proposed alignment.</p> <p>To ensure compliance with IFC PS5 / EBRD PR5 requirements.</p>	EBRD PR 5 IFC PS 5	Project Company with assistance from external consultants (if required)	Ongoing	Written statement and summary of works provide to the Lenders should PR5/PS5 issues be triggered.	
PR8 PS8	Cultural Heritage Cultural Heritage						
8.1	<p>Chance Find Procedure</p> <p>Develop a Chance Find Procedure and undertake a cultural heritage and archaeological assessment for the proposed gas pipeline (this shall include a site walkover). The Project Chance Find Procedure shall be shared with NEPCO for implementation during the gas pipeline works.</p>	<p>To ensure that any archaeological finds will be preserved during the construction process.</p>	EBRD PR 8 IFC PS 8	Project Company	30 September 2016	<p>Chance Finds Procedure adopted.</p> <p>Staff, including EPC Contractor and NEPCO, trained in implementation.</p>	
PR10	Information Disclosure and Stakeholder Engagement						
10.1	<p>Implementation of Stakeholder Engagement Plan (SEP)</p> <p>Implement the SEP, including immediate stakeholder engagement and consultations, based on the updated project ESIA and stakeholder grievance mechanism. As part of the SEP maintain a register of external communications including minutes of meetings held with stakeholders.</p>	<p>To maintain good stakeholder engagement and framework for sharing information with the public.</p>	EBRD PR 10 IFC PS 1 Best Practice	Project Company	Commence implementation immediately Continue throughout construction and operation	<p>Report to Lenders on consultation activities, including information disclosed</p> <p>Report to Lenders on all grievances received and how addressed/resolved</p>	

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10.2	<p>Develop Project Website</p> <p>If already available, update, or alternatively, develop, a website to be used to disclose project information and documentation, such as the SEP and its associated documents. Once the website has been created provide periodic updates.</p>	To generate an accessible channel of information disclosure and feedback loop	EBRD PR 10 IFC PS 1	Project Company	As soon as possible in line with ESIA disclosure schedule	Project website created and link disseminated to stakeholders and Lenders	
10.3	<p>Disclose Corporate Social Responsibility Plan as part of corporate plan</p> <p>Disclose a Corporate Social Responsibility (CSR) plan, which will include the project company's principles and criteria for selecting contributions, recent activities and their beneficiaries.</p>	Transparency around CSR initiatives	Best practice	ACWA	As soon as possible and at least within 6 months of construction	CSR plan disclosure on ACWA website	
10.4	<p>Publish corporate CSR Report by ACWA</p> <p>Publish a corporate CSR report and include a link on Project website.</p>	Enhancing stakeholder communication	EBRD PR 10 recommendation Best practice	ACWA	1 year after commencement of project, and then annually.	CSR report published	

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