

ENVIRONMENTAL AND SOCIAL ACTION PLAN (NOVEMBER 30, 2022.)

No.	Action	Environmental & Social Risks	Requirement	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	To conduct a cumulative impact assessment to consider the impacts generated by the Krnovo project.	To ensure that impacts are correctly assessed	EBRD PR1	Company	By Q4/2023	Cumulative impact assessment available	
1.2	Starting from the Integrated Management System, to develop a project Environmental, and Social Management System (ESMS) in line with international standards.	Promote EHS culture within the organization and meet international best practice Documentation of roles and responsibilities within Green Gvozd	EBRD PR1	Company	At least one month prior starting construction	Documents of the system available (as detailed in the next actions)	
1.3	To develop a Project ES policy specific for Gvozd WPP operations and should also include statements on principles and values adopted in engaging with workers, subcontractors, and communities on labour, and human rights.	Promote EHS culture within the organization and meet international best practice	EBRD PR1	Company	At least six months prior to the commercial operation date	Policy available	
1.4	Develop an ESMP for Construction (C-ESMP) and Operation (O-ESMP) to implement the management and mitigation measures resulted from the EIA and SIA studies. Include an organization chart showing	Ensure that environmental and social management measures prescribed	EBRD PR1	Company / EPC(M) adapts it to its	At least one month prior starting	C-ESMP and O-ESMP available	

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	<p>the organizational structure of the project management team hierarchy and defining all key management roles, including the ESHS.</p> <p>For each plan there should be a clear description of the roles and responsibilities for their implementation within Green Gvozd organisation; for each measure or set of measures, there will need to be performance indicators in the plan, so that it is clear what performance should be achieved; finally monitoring measures should be included in each plan, to guide the verification of implementation and to confirm that the required performance is achieved.</p> <p>Ensure that the Engineering, Procurement and Construction Contractor (EPC) or the EPC Management Contractor (EPCM) develops a Construction and Social Environment Management Plan (C-ESMP) and related sub-plans and monitors the compliance of construction sub-contractors.</p>	within the EIA and SIA are implemented		own technology	construction/operation		
1.5	<p>Conduct quarterly inspections of construction site and EPC/EPCM contractor's occupational health and safety (OHS) performance.</p> <p>Report on performance to Lenders every three months during construction. Report frequency to be increased in the event of significant issues/incidents on site.</p>	Ensure EPC/EPCM contractor's adoption of international requirements for OHS	EBRD PR1	Company	Throughout construction	Report available and submitted to Lenders quarterly	

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PR2	Labour and Working Conditions						
2.1	<p>Develop and implement a Project HR management system, as part of the overarching ESMS, including a HR Policy Statement and associated procedures. HR Policy Statement and procedures should cover as a minimum:</p> <ul style="list-style-type: none"> i) Non discrimination, equal rights, equal pay; ii) Prohibition of all forms of child labour and forced labour; (iii) Workers' rights and obligations (including worker code of conduct); (iv) Freedom of association and right to collective bargaining; (v) Informing workers about their rights, obligations, liabilities, and entitlements; (vi) Terms of employment including recruitment, hours of work, overtime arrangements and overtime compensation, rights to refuse overtime requests; (vii) Contractor management; (viii) Workers accommodation: processes and standards – guidance notes by IFC and EBRD 2009; (ix) Occupational health and safety; (x) Commitment to apply zero tolerance for any proven case of gender based violence, workplace harassment and sexual exploitation and abuse; (xi) Whistle-blower protection; (xii) Worker grievance mechanism <p>Company will ensure that the HR Policy, and associated plans and procedures adopted by their</p>	Management of worker relationships and reduction of labour risks	EBRD PR2 Best Practice International Labor Organization (ILO) requirements	Company/Contractors	One month prior to the commencement of the works	HR policy made publicly available to all workers Grievance form	

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	<p>EPC contractor/O&M Operator and apply to all project workers, including (sub)contractors' workers and those employed through agencies.</p> <p>Develop and implement a Workers Grievance Mechanism (WGM) compliant with the applicable Project standards and covering all contractor and subcontractor workers regardless of the tier.</p> <p>Company will verify that the workers are made acquainted with its use. The Company will assume a task to coordinate the implementation of the WGM</p>						
2.2	Integrate and maintain mitigation measures relating to labour and working conditions identified in the ESMP into the C- ESMP	Prevent employee or contractor disputes from grievances	EBRD PR2	Company / Contractors	At least one month prior starting construction	Development of C- ESMP	
2.3	<p>The Company will develop and implement an E&S Supplier & Vendor Management Plan for key suppliers.</p> <p>The Company will require the WTG Supplier to commit to implementing ESP PRs and ILO standards to avoid forced labour risks for the vendor's designated facility and pre-screened project key suppliers.</p> <p>The Company to undertake reasonable efforts to ensure that the gaps identified by the Company's labour audit of the WTG Supplier, covering the vendor's supply chain management system and designated assembly facility, are addressed.</p>	To manage human right risks such as forced/child labour	<p>EBRD PR2</p> <p>Good International Practices</p> <p>ILO labour standards on forced/child labour</p>	Company (with support from Bank)	Prior to delivery of WTG components to the site	<p>E&S Supplier & Vendor Management Plan in place and evidence of implementation provided</p> <p>WTG labour audit for its designated facility and approved key suppliers completed and its results submitted for Company approval</p>	

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	The E&S Supplier & Vendor Management Plan shall include quarterly reporting including the progress on the vendor's effort to address the gaps from the labour audit.					Evidence of implemented actions to address the gaps from the labour audit in relation to WTG supply chain management system submitted to Company and EBRD Quarterly reports on delivery of E&S Supplier & Vendor Management Plan with an update of replacement or new suppliers to WTG Supplier (template to be provided as part of the labour audit)	
PR3	Resource Efficiency and Pollution Prevention and Control						
3.1	Develop (and request the Contractor to develop) a water management plan for the management of specific issues during the construction and operation of the Project. Develop as part of the ESMS the stormwater and erosion management plan.	Pollution Prevention and Control – water	EBRD PR3	Company / Contractors	At least one month prior starting construction	C-ESMP, O-ESMP	

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3.2	Develop (and request the Contractor to develop) an Air Quality Management Plan to implement dust management and other measures presented in the EIA	Pollution Prevention and Control – air quality	EBRD PR3	Company / Contractors	At least one month prior starting construction	C-ESMP	
3.3	Provide an estimation of the GHGs expected to be produced during construction and specify the method used for calculation.	Pollution Prevention and Control - GHGs	EBRD PR3	Company / Contractors	At least one month prior starting construction	C-ESMP	
3.4	Develop (and request the Contractor to develop) a wastewater management plan to ensure that constructed septic tanks during construction and those to be used during operation are well contained and impermeable to prevent leakage of wastewater into the soil.	Pollution Prevention and Control - wastewater	EBRD PR3	Company / Contractors	At least one month prior starting construction	C-ESMP, O-ESMP	
3.5	Develop (and request the Contractor to develop) a Noise & Vibration Management Plan to ensure that construction and operation are monitored.	Pollution Prevention and Control – Noise	EBRD PR3	Company / Contractors	At least one month prior starting construction	C-ESMP, O-ESMP	
3.6	Develop (and request the Contractor to develop) a waste management plan for construction phase for all Project delivery packages and ensure that Contractor and its Sub-contractors comply with Project waste management commitments. The plan has to include key responsibilities and accountability; waste forecasting requirements; segregation; application of the waste management hierarchy; organizational structure; training; monitoring and reporting.	Pollution Prevention and Control – waste and hazardous material	EBRD PR3	Company / Contractors	At least one month prior starting construction	C-ESMP	

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3.7	Develop and implement (and request the Contractor to develop and implement) a soil management plan to ensure that: (i) segregation and storage in stable piles are carried out; (ii) rock is stored in stable piles; (iii) all storage piles are covered, including vegetative cover (native grass species) as needed to prevent wind/water erosion and desiccation; (iv) best practices is sued to prevent or retard run-off; (v) all disturbed areas are reinstated by covering with topsoil and seeding/planting with native species, or returning to tillage.	Pollution Prevention and Control - Soil	EBRD PR3	Company / Contractors	At least one month prior starting construction	C-ESMP	
PR4	Health and Safety						
4.1	Develop and implement an OHS plan(s) to guide all activities on project site during site preparation, construction, and operation and ensure that all contractors adopt these plans. Requirements to include, at a minimum: <ul style="list-style-type: none"> • Job and task-specific hazard analysis and controls for allactivities • Provision of personal protection equipment (PPE), requirements for use of PPE, and enforcement of PPEuse • Safety training for all personnel in their language, covering hazards and safety protocols of their jobs • Special training for specific hazards: working at heights, in excavations, with electricity • Review and approval of contractors' OHS plans 	Promote OHS and preventany incidents	EBRD PR2	Company/ Contractors	One month prior to the commencement of the works	OHS plans available	

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	<ul style="list-style-type: none"> • Oversight of contractor OHS implementation, including mandatory reporting • Recording incident statistics, including total work hours, lost time incidents, major injuries, fatalities, etc. <p>Obtain from the Contractors hard evidence that they engaged and maintain health and safety officers with sufficient skills and that all the workers involved in potentially hazardous work are properly trained and briefed specifically for each type or work and location.</p>						
4.2	<p>In connection to the above action 2.1, develop policies related to Gender-Based Violence (such as sexual harassment policies) and security (against security abuse to workers and project affected communities).</p> <p>Request all Contractors and subcontractors to adhere to it.</p>	Reputational benefit and prevent damage and complaints	EBRD PR4, Best practice	Company / Contractors	At least one month prior to construction	Policies in place	
4.3	<p>Develop a community health and safety (CHS) management plan based on the identified risks and impacts and define mitigation measures.</p> <p>Plan to consider at a minimum security, exposure to diseases, influx of workers, emission of dust and particulate, emission of matter, gaseous pollutants, increase of traffic, and emission of noise and vibrations.</p>		EBRD PR4	Company / Contractors	At least one month prior to construction	C-ESMP and SEP to address this issue Continuous communication with the local communities	

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	Contractors must ensure compliance with plan(s).						
4.4	<p>Ensure that the traffic management plan from the contractors is in place for the use of local roads by Project traffic which ensures that local residents take priority and risks and nuisance is minimised.</p> <p>Plan to consider access, routing, diversions, exceptional loads, and driver training. Consult with local stakeholders and provide timely information to users of land of times access to their land may be necessary, or limited.</p> <p>Plans must cover transport of turbines, rock/stone, and other materials to be brought to or removed from the site.</p> <p>Through stakeholder engagement, communicate plan to communities.</p>	Community complaints and unrest, accidents and fatalities	EBRD PR4/ Best practice	Company / Contractors	At least one month prior to commencement of construction	C-ESMP to address this issue Continuous communication with the local communities	
4.5	Develop site-specific emergency preparedness and response plan (EPRP). Plan to identify all possible emergency situations and identify mitigation measures and monitoring measures for such situations and communicating it to the stakeholders.	Prevent injuries and fatalities related to Project activities, Company reputation	EBRD PR4/ Best practice	Company / Contractors	At least one month prior to commencement of construction	EPRP available Stakeholders aware Near-miss or accidents monitoring implemented	
4.6	Identify and implement appropriate prevention plan/mitigation measures to manage exposure of hazardous materials and ensure that they safely handled, stored, transported and disposed.	Prevent spillage and contamination	EBRD PR4/ Best practice	Company / Contractors	At least one month prior to commencement of construction	C-ESMP	

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PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement						
5.1	<p>Following the completion of the land audit to confirm whether there are any material gaps with PR5 (identified in the Corrective Action Plan), a supplementary Resettlement Plan (S-RP) shall be developed, disclosed to the affected households, and implemented to satisfy PR5 and national legislation. Effective implementation of S-RP should be verified via Completion Report prior to the start of construction works on affected land plots.</p> <p>Information on the project grievance redress mechanism provided to the affected people to enable them to raise concerns and queries regarding land acquisition process.</p>	Avoid or address physical and/or economic displacement impacts related to the project	EBRD PR5 Good Practice	Company	<p>S-RP approved by EBRD and disclosed prior to the first disbursement</p> <p>Completion Report on S-RP prior to the start of works on the affected land plots</p>	<p>S-RP finalized, accepted by Bank, and disclosed publicly</p> <p>Completion Report submitted to Bank as part of Annual Environmental and Social Report (AESR)</p>	
PR6	Biodiversity and Living Natural Resources						
6.1	<p>Develop a habitat survey using the relevant EUNIS classifications at an appropriate scale and a Critical Habitat Assessment /Biodiversity Priority Features undertaken.</p> <p>A proportionate programme of biodiversity surveys is recommended also for the OHTL routes.</p> <p><u>Birds:</u> To collect more contemporary ornithology data to update the assessment and the collision risk model (12 hours of flight activity data per month per VP going forward). A report and updated collision risk</p>	Minimize habitat loss and meet international best practice.	EBRD PR6, Best practices	Company	By Q4 2023	<p>Habitat surveys, mapping and supplementary ornithological data updated.</p> <p>Collision risk model updated</p>	

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	<p>modelling exercise can then be produced for review to include a cumulative impact assessment.</p> <p>The collision risk modelling will need to be repeated using the selected turbine's parameters and a worst-case scenario using all the data < 180m including data from the 0-50m band.</p> <p><u>Bats:</u> Undertake pre-construction surveys of bats as per the relevant guidance, Rodriques et al. (2015) and NatureScot (2021) to ascertain if there are currently bats using the site.</p> <p><u>Mammals:</u> A mammal survey of the site.</p> <p><u>Reptiles and Amphibians:</u> A reptile and amphibian survey of the site.</p> <p><u>Invertebrates:</u> An invertebrate survey of the site and.</p>					Mammals, reptiles and invertebrates surveys available.	
6.2	Implement measures foreseen by EIA in the C-ESMP and O-ESMP	Minimize habitat loss and meet international best practice.	EBRD PR6, Best practices	Company	At least one month prior starting construction	C-ESMP, O-ESMP	
6.3	Design in-field monitoring, for monitoring implementation and effectiveness of mitigation, monitoring external threats to high biodiversity values.	Minimize habitat loss and meet international best practice.	EBRD PR6, Best practices	Company	At least one month prior starting operation	Long-term monitoring programme available	

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	Produce a long-term programme sufficient to assess the status of Critical Habitat and demonstrate biodiversity gains. Details of carcass search protocols for birds and bats to include search efficiency and carcass removal trials.						
PR8	Cultural Heritage						
8.1	Develop and require the earthwork conducting contractors to instruct their workers to follow the chance find procedures.	Minimize potential loss of cultural heritage	EBRD PR8	Company / Contractor	At least one month prior starting construction	C-ESMP to address this issue	
PR10	Information Disclosure and Stakeholder Engagement						
10.1	To provide public with relevant Project documentation by publishing documents to the Green Gvozd website, to include at least the SEP and NTS of the Project; and place construction notice boards at each end of the Project section, including all the nationally required Project information. To assign Community Liaison Officer in charge of implementation and updating of SEP.	Ensure transparency on E&S issues. Reputational benefits and engagement with key stakeholders	EBRD PR10, Legislative	Company	Throughout the project implementation cycle	Information disclosed (such as SEP and NTS) Evidence of SEP implementation submitted CLO assigned	