



Presented To:



## EGH 200MW Wind Farm in Egypt ESHS Manual – Deliverable D11

Presented By:



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**EcoConServ Environmental Solutions**  
12 El-Saleh Ayoub St., Zamalek, Cairo11211, Egypt  
Tel: +20227359078 / 27364818  
Fax: + 20227365397  
E-mail: [genena@ecoconserv.com](mailto:genena@ecoconserv.com)  
URL: [www.ecoconserv.com](http://www.ecoconserv.com)

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### Prepared by:

EcoConServ Environmental Solutions  
 12 El-Saleh Ayoub St., Zamalek Cairo, Egypt, 112111  
 Tel: + (2 02) 2735 9078 / 2736 4818  
 Fax: + (20 2) 2736 5397  
 E-mail: [genena@ecoconserv.com](mailto:genena@ecoconserv.com)

ECO Consult  
 Jude Center, Salem Al-Hindawi Street, Shmeisani, Amman, Jordan  
 Tel: 962 6 569 9769  
 Fax: 962 6 5697264  
 E-mail: [info@ecoconsult.jo](mailto:info@ecoconsult.jo)

### Prepared for:

RCREEE - Regional Centre for Renewable Energies and Energy Efficiency  
 Hydro Power Building, Floor 7  
 Block 11, Piece 15, Melsa District  
 Ard el Golf, Nasr City, Cairo  
 Arab Republic of Egypt

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## 1 INTRODUCTION

### 1.1 Background

The energy sector is a key driver for the socio-economic development of Egypt, representing around 13% of current GDP and thus making economic growth in the country contingent upon the security and stability of energy supply.

Since 2007, Egypt has experienced an energy supply deficit due to the rapid increase in energy consumption and the depletion of domestic oil and gas resources, shifting its position as a net hydrocarbon exporter for the last three decades to that of a net importer.

This has brought a set of challenges to the energy sector, including electricity shortages, caused in part by the decline of domestic gas production, as natural gas is the main source of electricity, accompanied by highly subsidized energy prices, with negative financial implications for already dwindling government revenues.

In response, the Government of Egypt (GoE) has taken bold steps to adopt an energy diversification strategy with increased development of renewable energy and implementation of energy efficiency, including assertive rehabilitation and maintenance programs in the power sector (IRENA, 2018).

To this extent, in 2013, the Arab Republic of Egypt (through the Ministry of Electricity and Renewable Energy) had developed and adopted the Integrated Sustainable Energy Strategy (ISES) 2015 – 2035, which provides an ambitious plan to increase the contribution of renewable energy to 20% of the electricity generated by the year 2022, of which 12% of wind power plants is foreseen, mostly in the Gulf of Suez (GoS) due to the wind characteristics in the area.

In that respect, the GoE issued the Renewable Energy Law (Decree Law 203/2014) to support the creation of a favourable economic environment for a significant increase in renewable energy investment in the country. The law sets the legal basis for the Build, Own and Operate (BOO) scheme to be implemented. Through the BOO mechanism, the Egyptian Electricity Transmission Company (EETC) invites private investors to submit their offers for solar and wind development projects, for specific capacities and the award will be made to that bidder with the lowest Kilowatt Hour (kWh) price. In addition, the GoE (through the New and Renewable Energy Authority (NREA)) provides the land for the investors.

EGH (hereafter referred to as ‘the Developer’), has been selected for the development of a 200-Megawatt (MW) Wind Power Project (hereafter referred to as ‘the Project’).

The Developer will be seeking financing for the Project from prospective lenders, including International Financial Institutions (IFIs). Therefore, the Developer wishes to design and manage the project in accordance with good international industry practice, including Environmental and Social (E&S) requirements. IFIs require disclosure of such E&S requirements as provided in further details in “Section 3.5”.

As part of such IFI E&S requirements, an Environment, Social, Health and Safety (ESHS) Management System (MS) Manual must be developed. In general, the objective of the ESHS MS Manual is to determine the overall structure and outline of the ESHS MS and provide details on some key components aimed at managing key impact, to be implemented for the Project during both the construction and operation phase.

### 1.2 Project Location

The Project is located in the Red Sea Governorate of Egypt, around 300 km to the southeast of the capital city of Cairo. More specifically, the Project is located near the Red Sea shoreline and within the Ras Gharib District of the Red Sea Governorate, where the closest residential areas include Ras Gharib city (located 18km to the east) refer to the figures below.

The Project is located within a 300km<sup>2</sup> Strategic Area that has been allocated by NREA for wind farm development Projects with a total capacity of 1,500 MW. Refer to Figure 3 for the Strategic Area location in relation to the Project site. A strategic ESIA study has been undertaken for the 300km<sup>2</sup> area known as the “ESIA for an Area of 300km<sup>2</sup> at the Gulf of Suez” (Lahmeyer & Ecodia, 2013) (hereafter referred to as “Strategic ESIA”), where this Strategic ESIA investigated the E&S issues at cumulative and strategic level. Within this, a land area of 25 km<sup>2</sup> has been allocated to the Developer by NREA for the development of this Project.



**Figure 1: Project Site in Relation to the Capital City of Egypt**



**Figure 2: Project Site**

### 1.3 Project Components

The key components of the Project are discussed below.

- **Wind turbines:** the wind turbines which convert the kinetic energy in wind (i.e., movement of wind) into electricity. At this stage, the project layout consists of 25 WTGs, each with a rated power of 8.0 MW. Table 1 details the Envision EN171-8.0 MW turbine type basic specifications:

**Table 1: Envision EN171-8.0 MW Wind Turbine Generator Specification**

|                       |                       |
|-----------------------|-----------------------|
| <b>Manufacturer</b>   | Envision              |
| <b>Model Type</b>     | Envision EN171-8.0 MW |
| <b>Rated Power</b>    | 8,000 kW              |
| <b>Rotor Diameter</b> | 171 m                 |
| <b>Hub Height</b>     | 100 m                 |

- **Foundations:** will be constructed to bolt the tower of the turbine in place. The foundation will be built with concrete reinforced with structural corrugated steel.
- **Crane Pad:** next to each wind turbine to accommodate cranes for the installation of the turbines and for maintenance activities. Each crane pad will be around 1,500 m<sup>2</sup> in area (38 m in width and 40 m in length).
- **Building Infrastructure:** onsite building infrastructure will be required for the daily operation of the Project. Such buildings could include an administrative building (offices) used for normal daily operational related work, control room and a warehouse;
- **Medium Voltage (MV) Cables:** The wind turbines will be connected through medium voltage cables to the substation. The connection between the turbines and the substation will be made using underground transmission cables buried in ground by trenches.

- **Communications Network:** the Project will have a Supervisory Control and Data Acquisition (SCADA) system for the remote operation of the facilities. A communication network will be installed which will consist of fibre optic cables connecting the turbines together to the SCADA system at substation. The communication system will be installed in the same trenches as the MV cables discussed above.
- **Substation:** the substation is a high voltage transformer substation that collects and converts the output from the turbines to a higher voltage that is appropriate for connection with the High Voltage National Grid (220 kV). One substation will be located within the Project area.
- **Road network:** a road network will be required for installation of the turbines during the construction process and for ease of access to the turbines for maintenance purposes during operation.

### **Associated Facilities**

Associated facilities will mainly include the Overhead Transmission Line (OHTL). EETC will be responsible for offsite connection works from the onsite substation to the National Grid that will be through a 220 kV OHTL. The OHTL has a length of approximately 1.5 km and connects to the existing HV network via a connection pylon. It is important to note that at this stage limited details are made available on the OHTL specifications (height, number of electrical towers, etc.).

EETC is considered a governmental entity which EGH has limited or no influence on and therefore the ability to manage impacts of the associated facility will be limited and EGH will liaise and interact with the EETC to try to influence and have some key mitigations implemented, as those included in the standalone ESIA study.

## **1.4 Project Phases and Schedule**

The key phases anticipated for the construction and operation phase of the Project are summarized below.

### **Construction Phase**

- **Phase 1: Engineering and Documentation:** This involves obtaining the permits required for the project and undertaking studies for development (e.g., geotechnical, topography, etc.) as well as preparing the detailed design for all project components.
- **Phase 2: Procurement and Delivery of Materials:** This involves the procurement of all materials required for the project development to include wind turbines as well as other material required for civil works, mechanical works, and electrical works.
- **Phase 3: Assigning of Subcontractors:** This includes tendering and selection of all subcontractors for the Project to include civil, electrical and mechanical contractors.
- **Phase 4: Mobilization and Early Works:** This includes undertaking all mobilization and early works to include installation of site offices, preparation of laydown area, preparation of site storage and workshop area and other as appropriate.
- **Phase 5: Construction of Turbines:** This will involve all civil works (excavations, foundations, drainage, etc.), mechanical works, and electrical works (underground works, low voltage works, earthing and lightning protection, etc.).
- **Phase 6: Erection of Turbines:** This will involve all works related to assembly and installation of the turbines through onsite cranes.
- **Phase 6: Construction of Substation:** This includes the civil and electrical works for construction of the substation located onsite and which will include civil works (grading, foundations, drainage, etc.) and electrical works (AC works, Medium Voltage works, etc.).
- **Phase 7: Construction of Control Building and Warehouse:** This includes the civil works, mechanical, and electrical works for construction of the control building and warehouse.

- **Phase 8: Construction of Road Networks:** This includes the civil works for construction of all required internal road networks.
- **Phase 9: Testing and Commissioning:** Commissioning tests involve standard electrical tests for the electrical infrastructure as well as the turbines, and inspection of routine civil engineering quality records. Careful testing at this stage is vital if a good quality wind farm is to be delivered and maintained.

### **Operation Phase**

The operation phase includes the normal daily operation of the wind farm. In addition, maintenance will also take place through a dedicated team. Typical routine maintenance time for a modern wind turbine is 40 hours per year. Non-routine maintenance may be of a similar order. Although minimal, maintenance activities may include turbine and rotor maintenance, lubrication of parts, washing of blades, maintenance of electrical components, full generator overhaul, etc.

### **1.5 Involved Entities**

Different entities are involved in the construction and operation phase of the project. Responsibilities of each entity are listed in the text below along with a general description of their roles.

- **Egypt Green Hydrogen (EGH):** The owner and developer of the Project (hereafter referred to as ‘the Developer’);
- **Egyptian Environmental Affairs Agency (EEAA):** the official governmental entity responsible for protection of the environment in Egypt. The EEAA is responsible for approval of the Environmental and Social Impact Assessment (ESIA) and making sure it complies with the “Environmental Protection Law No. 4 of 1994” and granting the environmental clearance for the Project;
- **Engineering, Procurement, and Construction (EPC) Contractor:** will be responsible for preparing the detailed design and layout of the Project; supply of the material and equipment (e.g., wind turbines); construction of the Project and its various components (turbines, internal roads, building infrastructure, and, etc.). The EPC Contractor for this Project has not been assigned yet;
- **Project Operator:** responsible for Operation and Maintenance (O&M) of the Project. The Project Operator has not been assigned at this stage;
- **Egyptian Electricity Transmission Company (EETC):** will be the off taker of electricity and is the entity that signed the Power Purchase Agreement (PPA) with the Developer. In addition, they will also be responsible for designing, building and operating the associated interconnection facilities. This will include the Overhead Transmission Line (OHTL) that will connect from the Project site to the existing national grid.
- **National Renewable Energy Authority (NREA):** is entity responsible for allocation of the land for the development of the Project;
- **International Financing Institutions (IFIs):** entities that will provide financing to the Developer for the development of the Project. Such IFIs will ensure that the Project is developed in accordance with GIIP E&S requirements. At this stage, the IFI will include EBRD as well as British International Investment (BII), European Investment Bank (EIB), U.S. International Development Finance Corporation (DFC) and the Deutsche Investitions und Entwicklungsgesellschaft (DEG);
- **Independent Environmental and Social Consultant (IESC):** is engaged by and on behalf of the IFIs to ensure that the Project is being developed in accordance with their E&S requirements.

## 2 ROLES AND RESPONSIBILITIES

This section identifies the EHSS (Environmental, Health, Safety and Social) roles and responsibilities for key personnel involved in the Project during construction and operation. These roles must be included in the job descriptions and be known by the concerned employees. Throughout the Project, project management and employees, all contractors/lower-tier contractors will comply with this plan as relevant.

### 2.1 Construction Phase

The figure below presents the organizational structure for the construction phase. Based on the organization structure, this section identifies the lines of authority and roles and responsibilities for those personnel that are involved in the EHSS management during construction.

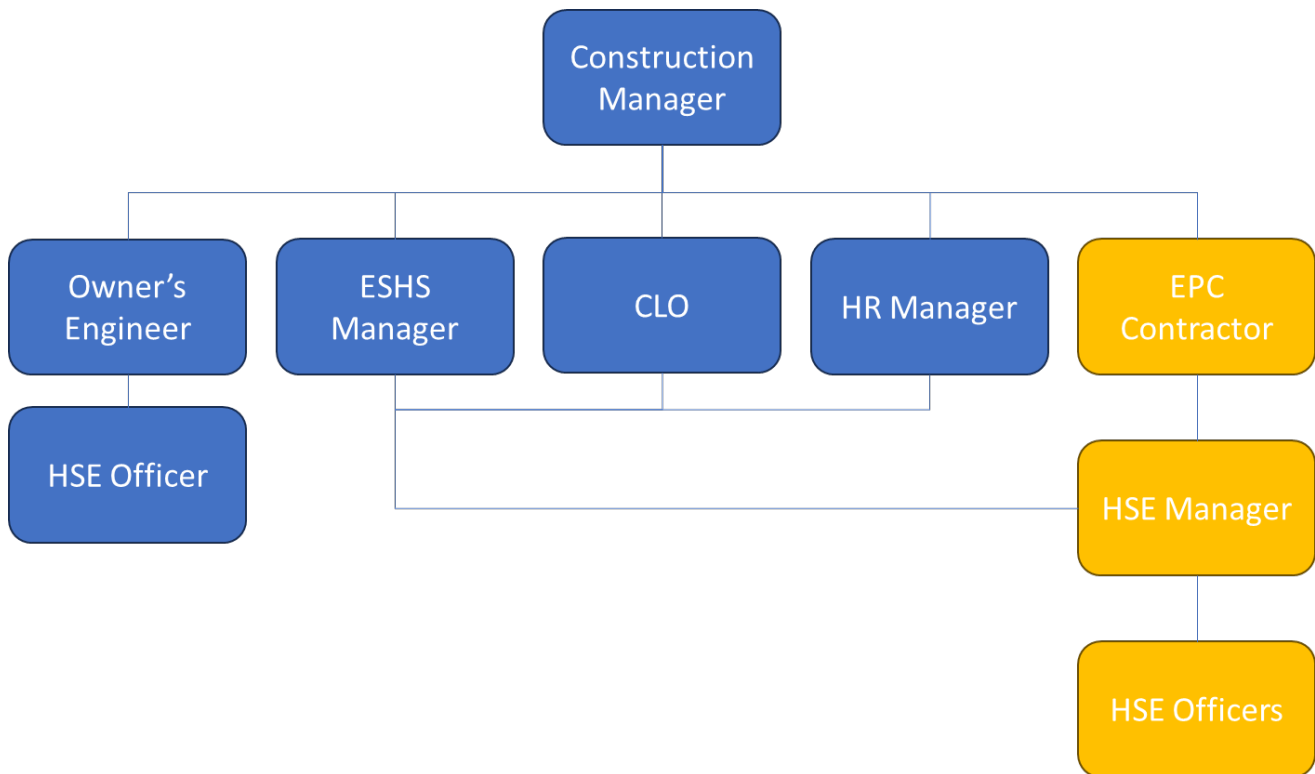


Figure 3: EGH Organizational Structure for Construction Phase

#### Construction Manager – EGH

- Overall monitoring of EHSS performance of the Project and defines feasible and sustainable actions to enhance it
- Ensures the availability of required resources to properly implement the EHSS plans and requirements
- Promotes leadership in EHSS and implement EHSS improvement initiatives
- Provides the means to control the EHSS risks on all activities of the Projects
- Enhances the EHSS compliance culture through exemplarity and commitment
- Chairs monthly EHSS Committee meetings (as detailed further in Section 7.1)
- Guarantees that all employees under his/her authority and responsibility are medically fit, trained, accredited, equipped and competent to perform their work
- Ensures the consistent enforcement and implementation of all programs, policies and procedures
- Ensures that EPC Contractor and subcontractors meet EHSS requirements of the Project
- Ensures effective coordination among all roles (ESHs Manager, CLO, HR Manager, and EPC Contractor)

- Oversees the overall procurement supervision to ensure alignment with EHSS requirements and project policies
- Ensures that supply chain risks are identified, assessed, and mitigated in collaboration with the ESHS Manager and HR Manager

#### **ESHs Manager – EGH**

- Supports Construction Manager in steering and implementing the EHSS management of Project
- Focal Point for all Health, Safety, Security and Environmental (ESHs) and social issues
- Maintains and updates EHSS rules, regulations and guidelines, local/international requirements as applicable to the project
- Advises on legislative changes concerning EHSS which may affect the Project
- Develop, maintains & monitors the EHSS plans (as identified in Section 3.3)
- Reviews and approves all EPC Contractor and subcontractors' EHSS plans as required
- Ensures the implementation and verification of corrective and preventive actions
- Supports the management in the promotion and improvement of EHSS awareness
- Assists in the investigation of any accident / near miss and compiles the necessary reports
- Communicates with EPC Contractor and subcontractors and advises on their EHSS matters
- Coordinates between the CLO, HR Manager, and EPC Contractor's HSE Manager to align on EHSS objectives
- Guides the EPC Contractor's HSE Manager to ensure compliance with project-wide EHSS requirements.
- Participates to all EHSS meetings (as detailed further in Section 7.1)
- Supports the EPC Contractor and subcontractors' managers in identifying and assessing the EHSS risks of their activities, as well as in defining mitigation measures to control these risks
- Plans, organizes, participates and conducts HSE audits (as detailed in Chapter 8)
- Keeps all records as required
- Collaborates with the Construction Manager to evaluate suppliers and contractors for compliance with EHSS standards and policies
- Monitors supply chain practices to ensure adherence to applicable EHSS requirements, particularly regarding hazardous materials, waste management, and worker safety
- To oversee and manage Project compliance with relevant national E&S legislation and international Lender E&S standards, as mentioned in 3.2 EHSS Policy
- To oversee and coordinate all Lender E&S visits and all IESC visits to the Project
- To oversee and lead the entire team related to these tasks (HSE staff, HR manager, CLOs) to ensure adequate interface between the various fields of expertise

#### **Community Liaison Officer (CLO) – EGH**

- Monitors and maintains a positive profile of the project with the community and required stakeholders
- Manages day to day interaction with all stakeholders during the construction and operation phase as indicated within the project Stakeholder Engagement Plan (SEP) including (but not limited to) local community members and others
- Implements and manages stakeholder grievance mechanism
- Implements, monitors and reports on the implementation of community support initiatives
- Coordinates with the ESHS Manager on community safety concerns
- Collaborates with the HR Manager to manage workforce-related grievances linked to community issues

- Collaborate with the HR manager and HSE staff on compliance with national and lender's labour laws and working conditions standards.
- Responsible for overseeing the Project's worker grievance mechanism and for liaising with the entire construction workforce (of the developer, EPC and sub-contractors).

#### **HR Manager – EGH**

- Overall responsibility for implementation of HR, employment and labor management principles and requirements for EGH staff (as detailed in Chapter 6)
- Undertakes and follows up on HR and labor management audit during construction and operation to ensure EPC Contractor compliance with the relevant requirements (as detailed in Chapter 8)
- Aligns with the ESHS Manager on worker safety and welfare initiatives
- Coordinates with the CLO on workforce grievances involving local communities
- Collaborates with the Construction Manager and EPC Contractor to ensure labor practices in the supply chain comply with local laws, international labor standards, and project policies
- Collaborate with the CLO and HSE staff on compliance with national and lender's labour laws and working conditions standards.

#### **Owner's Engineer (OE)**

EGH will appoint an Owner's Engineer (OE) for the project with the objective of ensuring that the EPC Contractor is adhering to the technical project specifications.

OE team will include an HSE officer whom will be mainly responsible for supporting the EGH ESHS Manager in undertaking and fulfilling his roles and responsibilities as identified earlier.

#### **EPC Contractor Requirements**

The EPC Contractor will each be required to assign a full-time and suitably qualified onsite HSE Manager that will be responsible for undertaking the following responsibilities:

- Should have basic knowledge of and experience in compliance with relevant national E&S legislation and international Lender E&S requirements during construction of large-scale infrastructure projects, as mentioned in 3.2 ESHS Policy
- Overall responsibility for development and implementation of EPC Contractor EHSS Management System requirements (as identified in Section 3.3)
- Ensures the availability of required resources to properly implement the EHSS plans and requirements
- Provides EHSS reporting requirements as relevant (as identified in Section 7.4 )
- Provides EHSS training requirements as relevant (as identified in Section 7.2)
- Undertakes EHSS inspection and monitoring requirements as relevant (as identified in Section 7.3)
- Organizes and participates in EHSS meetings (as discussed in Section 7.1)
- Reports on EHSS incidents
- Ensures that all subcontractors nominate sufficient HSE officers for the overall implementation of EHSS plans and requirements as applicable
- Reports to and works under the guidance of the ESHS Manager to ensure EHSS compliance
- Engages with the CLO and HR Manager on community and workforce-related safety concerns
- Ensures all suppliers and subcontractors comply with the project's EHSS requirements, including procurement policies and supply chain risk management
- Implements a system to monitor and report on supply chain compliance

- Collaborates with EGH's ESHS Manager and HR Manager to address supply chain issues and align on corrective actions (if needed)

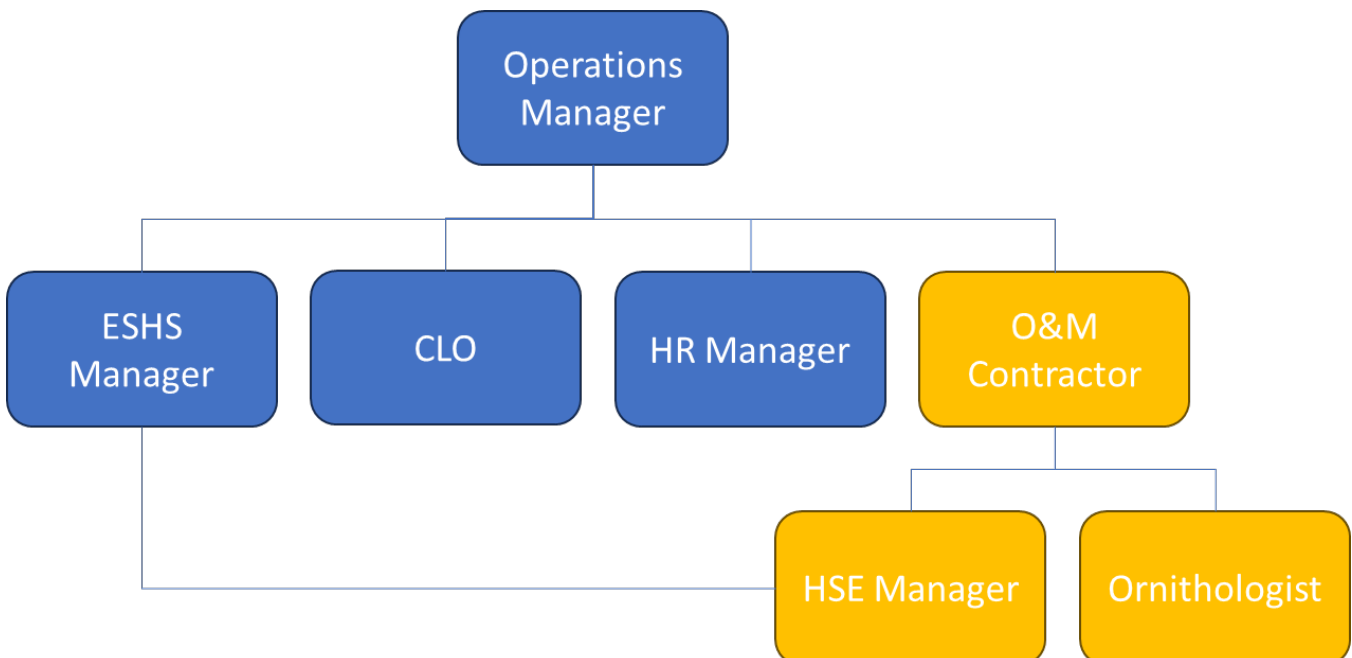
The HSE Manager should be supported by 2-3 (depending on construction schedule) full-time and suitably qualified onsite HSE Officers.

### **Other Project Personnel**

- Cooperate with, and constructively participates in the EHSS plans
- Comply with Project EHSS requirements that apply to an individual's work
- Work within competencies held
- Adhere to procedures to protect safety, the safety of your fellow employees, and the safety of the general public
- Encouraged to communicate and cooperate with the ESHS Manager, CLO, and HR Manager to ensure adherence to EHSS standards
- Proactively involved in the EHSS program; this involvement may include some aspects of planning, problem solving, priority setting, training, and improving site specific work practices
- Do not misuse or damage any equipment
- Adhere to procurement and supply chain policies as relevant to individual roles

## **2.2 Operation Phase**

The figure below presents the organizational structure for the operation phase. Based on the organization structure, this section identifies the lines of authority and roles and responsibilities for those personnel that are involved in the EHSS management during operation.



**Figure 4: EGH Organizational Structure for Operation Phase**

### **Operation Manager – EGH**

- Similar to Section 2.1 but for operation phase

**ESHS Manager – EGH**

- Similar to Section 2.1 but for operation phase

**Community Liaison Officer (CLO) – EGH**

- Similar to Section 2.1 but for operation phase

**HR Manager – EGH**

- Similar to Section 2.1 but for operation phase

**O&M Contractor – TBD**

- The O&M Contractor will be required to assign an onsite, full-time and suitably qualified HSE Manager. Roles and responsibilities will be similar to those identified in Section 2.1 but for operation phase.
- The O&M Contractor will be required to assign a dedicated ornithologist to ensure the effective implementation of biodiversity mitigation measures with particular focus on migration seasons.

**Other Project Personnel**

- Similar to Section 2.1 but for operation phase

### 3 OVERALL STRUCTURE OF E&S MANAGEMENT SYSTEM

#### 3.1 Objectives

This document outlines the ESHS MS that will be established and implemented by EGH during the construction and operation phase of the Project. The objectives of this ESHS MS Manual include the following:

- Identification of the overall structure and outline for the ESHS MS that will be implemented for the Project during both construction and operation;
- Identification and outline of the key procedures and plans to be developed at a later stage that will handle the key impacts and risks during construction and operation.
- Identification of an institutional framework to ensure that such procedures and measures are implemented effectively and efficiently. This includes identification of roles and responsibilities, training requirements, monitoring and reporting requirements, and other as applicable;
- Identify approach for periodically auditing entities involved during the construction and operation phase to ensure all ESHS requirements are implemented effectively; and

Identification of a high-level framework for labour management that should be adhered to during the construction and operation phase.

#### 3.2 Policies

The following policies are integral to EGH's commitment to sustainability, environmental stewardship, and social responsibility. These policies are applicable across the project's operations and are cascaded to the EPC Contractor and any other subcontractors.

##### 3.2.1 ESHS Policy

EGH is committed to the protection of the environment and to the health and safety of its employees, contractors and the local community through all stages of the project life cycle. To achieve this goal, EGH is committed to the following ESHS Policy:

- Comply with all applicable national and local ESHS laws and regulations as well as permitting requirements;
- Meeting internationally-accepted industry best practice ESHS requirements, including those of the relevant International Financing Institutions (IFIs), in specific the IFC Performance Standards, EBRD Performance Requirements, World Bank Group (WBG) General EHS Guidelines, and WBG EHS Guidelines for Wind Energy;
- Achieve a target of Zero fatalities, Zero injuries and zero significant environmental accidents
- Assessing and minimizing potential impacts to the community, worker and the environment;
- Establishing and maintaining an ESHS MS which identifies objectives and targets, risks and hazards, responsibilities, and includes systems of monitoring and reporting as well as incident and accident reporting and investigation;
- Realizing continual improvement in ESHS performance by developing indicators, through monitoring and auditing performance, and by implementing corrective actions where needed;
- Reporting externally on ESHS performance and encouraging dialogue with employees, local communities and other stakeholders to promote awareness;
- Setting and achieving targets that promote the efficient use of natural resources;
- Minimizing and managing all waste streams and where waste is generated ensure that it will be handled and disposed of safely and responsibly;
- Providing a place of work that is safe for everyone;

- Supporting and protecting internationally recognized human rights (including worker rights); and
- Ensuring that EGH's employees, and EGH's contractors, are made aware of this Policy and are adequately trained to manage the ESHS risks and impacts of their actions.

### 3.2.2 HR Policy

EGH is committed to upholding high standards of human resource management by fostering an inclusive, safe, and equitable working environment. The HR Policy ensures compliance with international standards and national laws, reflecting EGH Associated facilities will mainly include the Overhead Transmission Line (OHTL). EETC will be responsible for offsite connection works from the onsite substation to the National Grid that will be through a 220 kV OHTL. The OHTL has a length of approximately 1.5 km and connects to the existing HV network via a connection pylon. It is important to note that at this stage limited details are made available on the OHTL specifications (height, number of electrical towers, etc.).

's dedication to human rights and fair labor practices throughout all operations. Commitments under the HR Policy are as follows:

- Adhere to all applicable labor laws, including ILO standards, and promote ethical practices aligned with the UN Guiding Principles on Business and Human Rights.
- Provide a workplace free from discrimination, ensuring equal opportunities for all employees regardless of race, gender, religion, or background.
- Establish health and safety measures to protect employees and contractors, striving for zero workplace incidents.
- Respect workers' rights to collective bargaining and freedom of association.
- Uphold the prohibition of forced, compulsory, and child labor in all operations and supply chains.
- Foster continuous learning and development through training and capacity-building initiatives.
- Actively engage with employees and contractors to understand their needs and address concerns.
- Regularly assess labour practices and report progress through sustainability and ESG performance reports.

EGH reviews and updates this policy regularly to maintain alignment with best practices and evolving human resources standards.

### 3.2.3 Project Lifecycle Management and End of Life Policy

EGH is committed to sustainability and responsible business practices throughout the lifecycle of its projects. This policy ensures the minimization of environmental impacts, optimization of economic value, and alignment with international best practices across the construction, operation, and decommissioning phases of all EGH-owned and operated power plants. Under this guide, EGH is committed to the following:

- Prioritize the procurement of high-quality components with warranties, recyclability, and longevity to minimize lifecycle costs and environmental impact.
- Engage with suppliers that comply with international environmental and social standards, including labor rights, human rights, and ethical business practices.
- Promote the use of local suppliers and contractors wherever feasible, fostering economic benefits for host communities while reducing carbon emissions from transportation.

- Source materials that support circular economy principles, ensuring components can be reused, refurbished, or recycled at the end of their lifecycle.
- Maintain open and transparent procurement processes to ensure accountability, fairness, and compliance with international best practices.
- Evaluate procurement options based on total lifecycle costs, including durability, maintenance needs, and end-of-life management.
- Collaborate with suppliers to improve the sustainability of their offerings through innovation and adherence to EGH's standards.
- Reduce waste at the procurement stage by optimizing quantities and ensuring proper material handling to prevent losses or damage.

#### **3.2.4 Labour Policy**

EGH is dedicated to creating meaningful employment opportunities for local communities while ensuring compliance with international labor standards and national regulations. This policy underscores EGH's commitment to fostering sustainable development by prioritizing local employment at all project stages. Under this policy, EGH is committed to the following:

- Prioritize hiring workers from local communities to maximize economic benefits and promote social inclusion.
- Set local employment targets in collaboration with contractors to align with project goals.
- Provide training programs to build skills and enhance the employability of local workers.
- Promote long-term workforce development by advancing local talent in skilled and semi-skilled roles.
- Engage with Community Liaison Officers (CLOs) to address barriers to employment and communicate job opportunities effectively.
- Require contractors and subcontractors to adopt and report on local employment targets.
- Ensure contractors adhere to fair labor standards, including safe working conditions and fair wages for local hires.
- Provide local employees with adequate facilities, including proper accommodations, sanitation, and healthcare.
- Ensure non-discrimination in hiring practices to guarantee fair access to job opportunities for all community members.

#### **3.2.5 Environmental and Sustainability Policy**

- Incorporate sustainability principles into all business units, ensuring alignment with the UN Sustainable Development Goals and fostering long-term environmental and community benefits.
- Adhere to all relevant environmental laws and international standards, including IFC Performance Standards, Equator Principles, and ISO14001.
- Avoid critical habitats, implement monitoring programs, and adopt proper mitigation measures to protect biodiversity.

- Follow a cradle-to-cradle approach, prioritizing waste prevention, reuse, recycling, and responsible disposal while minimizing landfill use. Ensure end-of-life components, such as turbine blades, are reused or recycled.
- Optimize water use to avoid adverse effects on local resources.
- Regularly monitor and report environmental performance and compliance.
- Commit to reduce greenhouse gas emissions.
- Reinvest a share of project revenues into local communities, supporting sustainable development and economic empowerment.
- Develop stakeholder analyses and maintain grievance mechanisms to address community concerns effectively.

### 3.3 Overall Structure for Environmental & Social Management System

This section identifies the overall structure for ESHS MS for the Project. This ESHS MS Manual along with the associated management plans identified below are collectively considered the ESHS MS that will be implemented for the construction and operation phase of the Project.

#### A. Project Developer – EGH

This ESHS MS Manual, along with the assessment studies and the associated management plans and programs identified below are the ESHS plans and documents that have been prepared and are to be implemented by EGH. Such associated management plans should be read in conjunction with this ESHS MS Manual.

- Environmental and Social Impact Assessment (ESIA): the Environmental and Social Management Plan (ESMP) is the key outcome of the ESIA. ESMP requirements are to be implemented by EGH, the EPC Contractor and O&M Contractor as applicable. Relevant requirements of the ESMP are to be included within the relevant management plans discussed throughout this section.
- Stakeholder Engagement Plan (SEP): identifies a structured approach for stakeholder consultation and engagement to be implemented by EGH during the construction and operation phase. The SEP also includes a stakeholder grievance mechanism.
- Cumulative Effects Assessment (CEA): aims to identify priority Valued Environmental Components (VECs) at highest risk of cumulative effects from the wind power projects so that mitigation and monitoring measures are put in place to implement an adaptive management approach.
- Critical Habitat Assessment (CHA): aims to identify features that trigger the critical habitat status and priority biodiversity features.
- ESHS Manual: i.e. this document, which is to be implemented by EGH.
- Active Turbine Management Program (ATMP): will be developed and implemented by RCREEE on behalf of EGH during the operation phase of the Project.
- Biodiversity Management Plan (BMP) / Biodiversity Action Plan (BAP): outline the project's commitments to safeguard priority species and habitats, detailing the procedures for implementing biodiversity mitigation and management measures.
- Gender and Human Rights Risk Assessment Report: identifies and mitigates potential human rights and gender-related risks associated with the project. It analyses national-level issues, assessing project-specific impacts, proposing mitigation measures, and recommending further assessments if required.
- Detailed Noise Assessment Report: evaluates noise impacts from the wind farm using baseline monitoring and advanced modelling. It identifies sensitive receptors, assesses significance, and proposes mitigation measures to minimize impacts during construction and operation.
- Detailed Shadow Flicker Assessment Report: evaluates the potential effects of wind turbine shadow flicker on nearby receptors, such as residences or sensitive locations. Utilizes modelling to predict shadow flicker

duration and intensity, assesses compliance with international and local standards, and proposes mitigation measures, such as turbine repositioning or operational adjustments, to minimize impacts.

- Detailed Flood Risk Assessment Report: evaluates potential flood hazards at the project site, identifies vulnerable areas, and recommends mitigation measures to minimize risks to the project's infrastructure and surrounding communities.
- Climate Change Risk Assessment Report: evaluates potential climate-related risks to the project, such as extreme weather events, and recommends adaptive measures to enhance resilience and ensure long-term sustainability.
- Mini-Strategic Environmental and Cumulative Effects Assessment: assesses the project's cumulative impacts and sensitivity within the Important Bird Area (IBA), ensuring the location avoids highly sensitive areas and recommending mitigation strategies as needed.

#### **B. EPC Contractor – TBD**

The table below identifies the components of the ESHS MS that will be required from the EPC Contractor. The following components identified below will be specifically applicable and are to be implemented by the EPC Contractor and subcontractors involved. Additional details on the requirements of such plans and the overall framework is provided in "Chapter 5".

- ESHS MS Manual that should be aligned with the requirements of EGH ESHS MS Manual (i.e. this document)
- Water Management Plan
- Waste Management Plan
- Air Quality and Noise Management Plan
- Traffic and Transport Management Plan
- Worker Influx and Accommodation Plan
- Occupational Health and Safety Plan
- Emergency Preparedness and Response Plan
- Security Management Plan
- Chance Find Procedure
- Worker Grievance Mechanism
- Soil Management Plan
- Wastewater Management Plan
- Procurement and Supply Chain Management Plan
- Labour Management Plan

The above documents must be submitted to EGH for approval before commencement of construction activities onsite.

#### **C. O&M Contractor – TBD**

The table below identifies the components of the ESHS MS that will be required from the O&M Contractor. The following components identified below will be specifically applicable and are to be implemented by the O&M Contractor and subcontractors involved (if any). Additional details on the requirements of such plans and the overall framework are provided in "Chapter 5".

- ESHS MS Manual that should be aligned with the requirements of EGH ESHS MS Manual (i.e. this document)
- Water Management Plan
- Waste Management Plan

- Occupational Health and Safety Plan
- Emergency Preparedness and Response Plan
- Worker Grievance Mechanism

The above documents must be submitted to EGH for approval before commencement of operation activities onsite.

### 3.4 Key Impacts Anticipated during Planning and Construction

The tables below present the anticipated impacts from the Project during the construction and operation phase of the Project. In addition, the table also identifies the relevant management plans which includes the procedures and measures for handling the identified impact/risk and ensure it is eliminated or reduced to the greatest extent possible, as well as overall implementation responsibility.

**Table 2: Key Anticipated Impacts During Construction**

| Receptor                              | Anticipated Impact   | ESHS Document                                | Overall Implementation |
|---------------------------------------|--|--|------------------------|
| Hydrology and Hydrogeology            | Risk of soil and groundwater contamination during the various construction activities from improper waste management.  | Waste Management Plan                        | EPC Contractor         |
|                                       |  | Wastewater Management Plan                   |                        |
|                                       |  | Soil Management Plan                         |                        |
| Archaeology and Culture Heritage      | Improper management of construction activities could disturb/damage potential archaeological remains which could be buried in the ground (if any).   | Chance Find Procedure                        | EPC Contractor         |
| Air Quality and Noise                 | Construction activities will likely result in an increased level of dust, particulate matter and pollutant emissions as well as noise levels which could affect workers as well as nearby receptors.   | Air Quality and Noise Control Plan           | EPC Contractor         |
| Infrastructure and Utilities          | Project could affect existing capacity of infrastructure and utilities related to water supply entailing constraints on the existing resources and users.  | Water Management Plan                        | EPC Contractor         |
|                                       | If transportation activities of the various project components to the site are not properly managed beforehand, they could entail risk of damage to the existing roads and could be of public safety concerns to other users on the road as well as workers on site.   | Traffic Management Plan                      | EPC Contractor         |
| Community Health, Safety and Security | This could include but not limited to the following risks on nearby local communities: (i) trespassing of unauthorized personnel; (ii) potential impacts from presence of security personnel due to inappropriate management and conduct of security personnel towards the local communities; (iii) potential impacts from workforce influx during construction. | Worker Influx and Accommodation Plan         | EPC Contractor         |
|                                       |  | Security Management Plan                     | EPC Contractor         |
|                                       |  | Stakeholder Engagement Plan                  | EGH and EPC Contractor |
|                                       |  | Labour Management Plan                       |                        |
|                                       |  | Procurement and Supply Chain Management Plan |                        |
| Socio-economic                        | The Project is expected at a minimum to provide job opportunities for local communities as well as a social responsibility program. This, to some extent, could contribute to enhancing the living environment for its   | Stakeholder Engagement Plan                  | EGH                    |

|                                |   |  |                        |
|--------------------------------|---|--|------------------------|
|                                | inhabitants, elevate their standards of living, and bring social and economic prosperity to local communities. It is important to note that most of these jobs are not long term and mostly during the construction phase and some of these jobs may not be for people from the closest community to the project. | Labour Management Plan                       | EGH and EPC Contractor |
|                                |   | Procurement and Supply Chain Management Plan |                        |
| Occupational Health and Safety | There will be some risks to workers health and safety from the various construction activities anticipated.   | Occupational Health and Safety Plan          | EPC Contractor         |

**Table 3: Key Anticipated Impacts During Operation**

| Receptor                              | Anticipated Impact   | ESHS Document                                | Overall Implementation |
|---------------------------------------|--|--|------------------------|
| Hydrology and Hydrogeology            | Risk of soil and groundwater contamination during the various operation activities from improper waste management.   | Waste Management Plan                        | O&M Contractor         |
|                                       |  | Soil Management Plan                         |                        |
|                                       |  | Wastewater Management Plan                   |                        |
| Infrastructure and Utilities          | Project could affect existing capacity of infrastructure and utilities related to water supply entailing constraints on the existing resources and users.  | Water Management Plan                        | O&M Contractor         |
| Community Health, Safety and Security | This could include potential Impacts from presence of security personnel relate to inappropriate management and conduct of security personnel towards the local communities.   | Security Management Plan                     | O&M Contractor         |
|                                       |  | Stakeholder Engagement Plan                  | EGH                    |
| Socio-economic                        | The Project is expected at a minimum to provide job opportunities for local communities as well as a social responsibility program. This could contribute to enhancing living environment for its inhabitants, elevate their standards of living, and bring social and economic prosperity. However, it is important to note that this phase will require fewer personnel hence fewer job opportunities will be available. | Stakeholder Engagement Plan                  | EGH and O&M Contractor |
|                                       |  | Labour Management Plan                       |                        |
|                                       |  | Procurement and Supply Chain Management Plan |                        |
| Occupational Health and Safety        | There will be some risks to workers health and safety from the various operation and maintenance activities anticipated.   | Occupational Health and Safety Plan          | O&M Contractor         |

### 3.5 ESIA and Supporting Documents Information Disclosure

It is of utmost necessity to ensure that stakeholders are kept well informed about the Project throughout its life cycle, thus information will be accessible to the public, key stakeholders, and local communities through dissemination of related documents.

Information about the Project is made accessible to stakeholders and the broad public through a disclosure package that includes the following key documents, available publicly in Arabic and English language.

- Environmental and Social Impact Assessment (ESIA) for the EGH Wind Farm
- Non-Technical Summary (NTS)

- Stakeholder Engagement Plan (SEP)
- Cumulative Effect Assessment (CEA)
- Critical Habitat Assessment (CHA)
- Biodiversity Management Plan (BMP)
- Biodiversity Action Plan (BAP)
- Detailed Noise Assessment Report
- Detailed Shadow Flicker Assessment Report
- Detailed Flood Risk Assessment Report
- Climate Change Risk Assessment Report
- Gender & Human Rights Risk Assessment Report
- Mini-Strategic Environmental and Cumulative Effect Assessment
- ESHS MS Manual: as discussed earlier, the Manual determines the overall structure and outline of an ESHS MS and provide details on some key components aimed at managing key impact, to be implemented for the Project during both the construction and operation phase. Such components will need to be further developed and articulated later.

The above documents are available at the following avenues:

- Developer Website (XXXX). The documentation above will remain at the website for the life of the project.
- Hard copies available at Ras Gharib local governmental units

**Ras Gharib City Council**

Location: Al-Mina Street

City: 11432 Ras Ghareib – Red Sea

Tel: 01001318480 – 01201958777

- Soft copies can also be made available to stakeholders via email to:  
XXXXX

## 4 LEGAL AND POLICY FRAMEWORK

The ESHS MS has been prepared taking into account all environmental, health, safety, and social legislations that are applicable in Egypt and for the Project – to include laws, regulations, instructions, and standards as issued by the various applicable governmental entities.

In addition, the Project is seeking financing from International Financing Institutions (IFI). Therefore, the ESHS Manual has also been prepared taking into account Good International Industry Practice (GIIP) requirements, in particular IFC Performance Standards, EBRD Performance Requirements and applicable WBG EHS Guidelines.

### National Legislations

The table below identifies the relevant legal requirements that must be taken into account as part of the associated management plans identified in Section 3.3 earlier.

**Table 4: National ESHS Legislations**

| Attribute                         | Key Legislations   | Reference Document                       |
|-----------------------------------|--|--|
| Water Resources                   | <ul style="list-style-type: none"> <li>Ministry of Health and Population Decree 458/2007</li> <li>Environmental Law 4/1994 and its Amendments Law 9/2009</li> <li>Law 12/1984 for irrigation and its amended executive regulations</li> </ul>                              | Water Management Plan                    |
| Waste Management                  | <ul style="list-style-type: none"> <li>Environmental Law 4/1994 and its Amendments Law 9/2009</li> <li>Executive Regulation 1095/2011 – modified by 710/2012 and by 964/2015</li> <li>Wastewater Disposal Law 93/1962 and associated Ministerial Decree 44/2000</li> </ul> | Waste Management Plan                    |
|                                   |  | Wastewater Management Plan               |
| Air Quality and Noise             | <ul style="list-style-type: none"> <li>Environmental Law 4/1994 and its Amendments Law 9/2009</li> <li>Executive Regulation 1095/2011 – modified by 710/2012 and by 964/2015</li> </ul>  | Air Quality and Noise Management Plan    |
| Soil                              | <ul style="list-style-type: none"> <li>Environmental Law 4/1994 and its Amendments Law 9/2009</li> <li>Wastewater Disposal Law 93/1962 and associated Ministerial Decree 44/2000</li> </ul>  | Soil Management Plan                     |
| Traffic and Transport             | <ul style="list-style-type: none"> <li>Traffic Law 66/1973 and its Amendments Law 121/2008</li> <li>Public Roads Law 84/1968</li> <li>Public Roads Works Law 140/1956</li> </ul>   | Traffic and Transport Management Plan    |
| Worker Accommodation              | <ul style="list-style-type: none"> <li>Minister of Labour Decree No. 200/2003 and Decree 458/2007</li> <li>Minister of Labour Decree 153/2003</li> </ul>   | Worker Influx and Accommodation Plan     |
| Occupational Health and Safety    | <ul style="list-style-type: none"> <li>Environmental Law 4/1994 and its Amendments Law 9/2009</li> <li>Labour and Workforce Safety Law 12/2003</li> <li>Minister of Labour Decree 200/2003 and Decree 458/2007</li> </ul>  | Occupational Health and Safety Plan      |
| Emergency Preparedness            | <ul style="list-style-type: none"> <li>Environmental Law 4/1994 and its Amendments Law 9/2009</li> </ul>   | Emergency Preparedness and Response Plan |
| Security Arrangement              | <ul style="list-style-type: none"> <li>Security Companies for Facilities Law 68/2015 amended by law 126/2015</li> </ul>  | Security Management Plan                 |
| Archaeology and Cultural Heritage | <ul style="list-style-type: none"> <li>Archaeology Protection Law 117/1983 and its Amendments Law 3/2010</li> </ul>  | Chance Find Procedure                    |
| Worker Grievances                 | <ul style="list-style-type: none"> <li>Ministry of Labour Decree 185/2003</li> </ul>   | Worker Grievance Mechanism               |
| Labour and Employment             | <ul style="list-style-type: none"> <li>Minister of Labour Decree No. 200/2003 and Decree 458/2007</li> <li>Minister of Labour Decree 153/2003</li> </ul>   | Labour Management Plan                   |

|                              |   |  |
|------------------------------|---|--|
| Procurement and Supply Chain | <ul style="list-style-type: none"> <li>Minister of Labour Decree No. 200/2003 and Decree 458/2007</li> <li>Minister of Labour Decree 153/2003</li> <li>Environmental Law 4/1994 and its Amendments Law 9/2009</li> </ul>  | Procurement and Supply Chain Management Plan |
| Biodiversity                 | <ul style="list-style-type: none"> <li>Environmental Law No. 4 of the Year 1994 and its Amendments Law No. 9 of the year 2009.</li> <li>Environmental Impact Assessment Guidelines and Monitoring Protocols for Wind Energy Development Projects along the Rift Valley/Red Sea Flyway with a particular reference to wind energy in support of the conservation of Migratory Soaring Birds (MSB)</li> </ul> | Active Turbine Management Program            |

### European Bank for Reconstruction and Development (EBRD)<sup>1</sup>

The EBRD is committed to promoting European Union (EU) environmental standards as well as the European Principles for the Environment, to which it is a signatory, and which are also reflected in the Performance Requirements (PR) summarized below. EBRD expects clients to assess and manage the environmental and social issues associated with their projects so that projects meet the PRs. The relevant PRs in relation to the Project are summarized below.

- PR 1 Assessment and Management of Environmental and Social Impacts and Issues
- PR 2: Labour and Working conditions
- PR 3: Resource efficiency and pollution prevention and control
- PR 4: Health and Safety
- PR 5: Land Acquisition, involuntary resettlement and economic displacement
- PR 6: Biodiversity conservation and sustainability management of living natural resources
- PR 7: Indigenous People (not applicable in Egypt and therefore this Project).
- PR 8: Cultural heritage
- PR 9: Financial Intermediaries (not applicable for this Project).
- PR 10: Information disclosure and stakeholder engagement

### International Finance Corporation (IFC)<sup>2</sup>

The IFC of the World Bank provides a range of guidance documents related to the assessment and management of environmental and social issues in project development. Not only does IFC guidance provide a generally accepted basis for good practice, but it also provides the technical cornerstone for the Equator Principles which set out the environmental and social requirements of banks for project finance. The IFC requirements have become the *de facto* international environmental and social performance benchmark for project financing.

The IFC Performance Standards on Social and Environmental Sustainability set out a framework for managing and improving project performance from planning and assessment, through construction and operations to closure. The Performance Standards include the following:

- PS1: Assessment and Management of Environmental and Social Risks and Impacts
- PS2: Labour and Working Conditions
- PS 3: Resource Efficiency and Pollution Prevention
- PS 4: Community Health, Safety and Security
- PS 5: Land Acquisition and Involuntary Resettlement
- PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

<sup>1</sup> <https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>

<sup>2</sup> <https://www.ifc.org/en/insights-reports/2012/ifc-performance-standards>

- PS 7: Indigenous Peoples (not applicable for this Project).
- PS 8: Cultural Heritage

In addition, there are also General EHS Guidelines document that are produced by World Bank Group (WBG)<sup>3</sup> and which are considered applicable for the IFC. Such EHS guidance document provides detailed management and technical recommendations with regards to GIIP. In addition, there are also sector-specific EHS guideline document for Wind Energy produced. This EHS guidance document provides detailed management and technical recommendations with regards to Industry Best Practice.

The above should also be considered as part of the associated management plans identified in Section 3.3 earlier.

## 5 MANAGEMENT PLAN FRAMEWORK

As discussed previously in “Chapter 3”, the EPC Contractor and O&M Contractor are required to prepare several environmental and social management plans to be submitted to EGH for approval before commencement of any construction or O&M work.

This Chapter provides additional details on the overall framework required for the management plan to be considered as applicable.

| <b>Water Management Plan</b>       |   |
|------------------------------------|---|
| Objective                          | Identification of procedures for onsite management of water supplies and minimization of water consumption.   |
| Responsibility                     | EPC Contractor and their subcontractors (construction phase)<br><br>O&M Contractor and its subcontractors (operation phase)   |
| Spatial applicability              | EGH Project site  |
| Guiding legislations and reference | <ul style="list-style-type: none"> <li>▪ Local legislations:               <ul style="list-style-type: none"> <li>- Ministry of Health and Population Decree 458/2007</li> <li>- Environmental Law 4/1994 and its Amendments Law 9/2009</li> <li>- Law 12/1984 for irrigation and its amended executive regulations</li> </ul> </li> <li>▪ Lender requirements:               <ul style="list-style-type: none"> <li>- EBRD PR 3, IFC PS 3, WBG EHS General Guidelines / EHS Guidelines for Wind Energy</li> </ul> </li> </ul>  |
| Required action/planning           | <ul style="list-style-type: none"> <li>▪ Identification of sources of water supply that will be utilized for the Project, to include both potable and non-potable water requirements (sourcing of water is expected to be delivered via tanks but this is to be confirmed in the ESIA).</li> <li>▪ Estimation of anticipated quantities of potable and non-potable water requirements.</li> <li>▪ Ensure proper labeling of tanks as potable water, storage in shaded or insulated areas to protect against high temperatures, and regular cleaning and maintenance to prevent contamination.</li> <li>▪ Identify in detail procedures for onsite management of water supplies and minimization of water consumption. This could include but not limited to: (i) identify location of all water storage tanks onsite with clear markings as potable/non-potable; (ii) ensure water tanks are completely closed at all times with appropriate protection against sunlight; (iii) inspections for potable and non-potable tanks and connections to ensure there are no leaks; (iv) install water saving fittings (taps, urinals, etc.) in toilets of site offices, and other as applicable.</li> <li>▪ Reflect the procedural actions for water management in: (i) induction training material for workers; and (ii) repeated/refresher Toolbox Talks (TBT).</li> <li>▪ Identify Key Performance Indicators (KPI) for implementation of plan.</li> <li>▪ Identify roles and responsibilities for implementation of plan.</li> </ul> |

<sup>3</sup> <https://documents1.worldbank.org/curated/zh/157871484635724258/pdf/112110-WP-Final-General-EHS-Guidelines.pdf>

|                         |  |              |  |
|-------------------------|--|--------------|--|
| Monitoring requirements | <ul style="list-style-type: none"> <li>Monitoring program shall be at a minimum based on the following schedule</li> </ul> | Parameters   | As per parameters included in Decree 458/2007  |
|                         |  | Location     | Potable water tanks (if applicable)  |
|                         |  | Frequency    | Quarterly  |
|                         |  | Duration     | 1 sample   |
|                         |  | Prerequisite | Discuss with EEAA and agree on details of this program   |
|                         |  | Review       | As applicable based on project updates and as required by related parties (regulator, developer, lender, etc.) |
|                         | <ul style="list-style-type: none"> <li>Continuous inspection and reporting by EHS staff</li> </ul>                         |              |  |
| Reporting Requirements  | <ul style="list-style-type: none"> <li>Monthly water consumption report to EGH</li> </ul>                                  |              |  |

| Waste Management Plan              |   |
|------------------------------------|---|
| Objective                          | Identification of procedures for onsite management and final disposal of generated waste to include solid waste (municipal and construction) and hazardous waste.   |
| Responsibility                     | EPC Contractor and their subcontractors (construction phase)<br>O&M Contractor and its subcontractors (operation phase)   |
| Spatial applicability              | EGH Project site  |
| Guiding legislations and reference | <ul style="list-style-type: none"> <li>Local legislations: <ul style="list-style-type: none"> <li>Environmental Law 4/1994 and its Amendments Law 9/2009</li> <li>Executive Regulation 1095/2011 – modified by 710/2012 and by 964/2015</li> <li>Wastewater Disposal Law 93/1962 and associated Ministerial Decree 44/2000</li> </ul> </li> <li>Lender requirements: <ul style="list-style-type: none"> <li>EBRD PR 3, IFC PS 3, WBG EHS General Guidelines</li> </ul> </li> </ul>  |
| Required action/planning           | <ul style="list-style-type: none"> <li>Inclusion of a waste inventory which identifies the source and anticipated quantities of each waste stream;</li> <li>Identify final disposal location of each waste streams (solid waste (municipal and construction) and hazardous waste). In addition, confirm that disposal locations identified are well managed and have sufficient capacity to receive amounts generated from project without affecting other projects and users.</li> <li>Identify in detail the waste management procedures to be implemented to manage impacts. This could include but not limited to: (i) contract arrangement with official entity responsible for collection and final disposal of waste streams; (ii) specifications of waste containers, bins and collection areas to be utilized for onsite disposal; (iii) utilization of waste manifests by contractors; (iv) identification and consideration of recycling and reuse measures for waste streams; (v) prohibition of fly-dumping of waste streams to the land, and other.</li> <li>Use of licensed waste companies for the collection and disposal of all waste types, including hazardous waste, disposal wastewater, and solid waste.</li> <li>Reflect the procedural actions for waste management in: (i) induction training material for workers; and (ii) repeated/refresher Toolbox Talks (TBT).</li> <li>Identify Key Performance Indicators (KPI) for implementation of plan.</li> <li>Identify roles and responsibilities for implementation of plan.</li> </ul> |
| Monitoring requirements            | <ul style="list-style-type: none"> <li>Continuous inspection and reporting by EHS staff</li> </ul>  |

|                       |   |
|-----------------------|---|
| Reporting Requirement | <ul style="list-style-type: none"> <li>Monthly waste generation report supported with waste manifests to EGH</li> <li>Documentation of waste disposal through <b>licensed companies</b>.</li> </ul> |
|-----------------------|---|

| <b>Wastewater Management Plan</b>  |   |
|------------------------------------|---|
| Objective                          | Identification of procedures for onsite management and final disposal of generated wastewater.  |
| Responsibility                     | EPC Contractor and their subcontractors (construction phase)<br><br>O&M Contractor and its subcontractors (operation phase)   |
| Spatial applicability              | EGH Project site  |
| Guiding legislations and reference | <ul style="list-style-type: none"> <li>Local legislations:               <ul style="list-style-type: none"> <li>Environmental Law 4/1994 and its Amendments Law 9/2009</li> </ul> </li> <li>Lender requirements:               <ul style="list-style-type: none"> <li>EBRD PR 3, IFC PS 3, WBG EHS General Guidelines</li> </ul> </li> </ul>  |
| Required action/planning           | <ul style="list-style-type: none"> <li>Conduct a wastewater inventory to identify sources and estimate quantities of wastewater generated during construction and operation phases.</li> <li>Identify final disposal location of generated wastewater. In addition, confirm that disposal locations identified are well managed and have sufficient capacity to receive amounts generated from project without affecting other projects and users.</li> <li>Identify in detail the wastewater management procedures to be implemented to manage impacts. This could include but not limited to: (i) contract arrangement with official entity responsible for collection and final disposal of wastewater; (ii) specifications of onsite wastewater storage tanks or holding tanks for disposal; (iii) utilization of wastewater manifests by contractors; (iv) prohibition of the discharge of untreated wastewater into land, water bodies etc.</li> <li>Use of licensed wastewater companies for the collection and disposal of wastewater.</li> <li>Reflect the procedural actions for wastewater management in: (i) induction training material for workers; and (ii) repeated/refresher Toolbox Talks (TBT).</li> <li>Identify Key Performance Indicators (KPI) for implementation of plan.</li> <li>Identify roles and responsibilities for implementation of plan.</li> </ul> |
| Monitoring requirements            | <ul style="list-style-type: none"> <li>Continuous inspection and reporting by EHS staff</li> </ul>  |
| Reporting Requirement              | <ul style="list-style-type: none"> <li>Monthly wastewater generation report to EGH</li> <li>Documentation of wastewater disposal through <b>licensed companies</b>.</li> </ul>  |

| <b>Soil Management Plan</b>        |   |
|------------------------------------|---|
| Objective                          | Ensure sustainable management of soil during construction and operation, minimizing erosion, sedimentation, and contamination.  |
| Responsibility                     | EPC Contractor and their subcontractors (construction phase)<br><br>O&M Contractor and its subcontractors (operation phase)   |
| Spatial applicability              | EGH Project site  |
| Guiding legislations and reference | <ul style="list-style-type: none"> <li>Local legislations:               <ul style="list-style-type: none"> <li>Environmental Law 4/1994 and its Amendments Law 9/2009</li> <li>Wastewater Disposal Law 93/1962 and associated Ministerial Decree 44/2000</li> </ul> </li> <li>Lender requirements:               <ul style="list-style-type: none"> <li>EBRD PR 3, IFC PS 3, WBG EHS General Guidelines</li> </ul> </li> </ul> |

|                          |   |
|--------------------------|---|
| Required action/planning | <ul style="list-style-type: none"> <li>Identify areas prone to erosion and implement erosion control measures (if needed).</li> <li>Store topsoil in designated areas for reuse in post-construction restoration.</li> <li>Ensure proper storage and disposal of excavated materials and excess spoil in approved locations.</li> <li>Prevent contamination by implementing spill prevention measures and ensuring proper handling of hazardous materials.</li> </ul> |
| Monitoring requirements  | <ul style="list-style-type: none"> <li>Continuous inspection and reporting by EHS staff</li> </ul>  |
| Reporting Requirement    | <ul style="list-style-type: none"> <li>Monthly soil management reports to EGH</li> </ul>  |

| Air Quality and Noise Management Plan |  |            |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |
|---------------------------------------|--|------------|---|----------|---|-----------|-----------|----------|--------------------|---------------------|--------------------|-----------|------------------|--------------|--|
| Objective                             | Identification of procedures to ensure that air pollutant and noise sources are properly managed and controlled onsite.  |            |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |
| Responsibility                        | EPC Contractor and their subcontractors  |            |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |
| Spatial applicability                 | EGH Project site   |            |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |
| Guiding legislations and reference    | <ul style="list-style-type: none"> <li>Local legislations: <ul style="list-style-type: none"> <li>Environmental Law 4/1994 and its Amendments Law 9/2009</li> <li>Executive Regulation 1095/2011 – modified by 710/2012 and by 964/2015</li> </ul> </li> <li>Lender requirements: <ul style="list-style-type: none"> <li>EBRD PR 3, IFC PS 3, WBG EHS General Guidelines / EHS Guidelines for Wind Energy</li> </ul> </li> </ul>   |            |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |
| Required action/planning              | <ul style="list-style-type: none"> <li>Identify sources of air quality pollutants and noise.</li> <li>Identify in detail the air quality and noise management procedures to be implemented which could include but not limited to: (i) equipping workers with proper Personal Protective Equipment related to dust and noise control (e.g. masks, eye goggles, breathing masks, ear muffs, etc.); (ii) regular watering of construction active areas (e.g. containment, covering, bundling); (iii) proper management of stockpiles and excavated material, (iv) adhering to a 25 km/h speed limit onsite; (v) proper covering of trucks transporting aggregates and fine materials and other.</li> <li>Reflect the procedural actions for air quality and noise management in: (i) induction training material for workers; and (ii) repeated/refreshers Toolbox Talks (TBT).</li> <li>Identify Key Performance Indicators (KPI) for implementation of plan.</li> <li>Identify roles and responsibilities for implementation of plan.</li> </ul> |            |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |
| Monitoring requirements               | <ul style="list-style-type: none"> <li><b>Air Quality (Minimum requirements):</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">Parameters</td><td>CO, SO<sub>2</sub>, NO<sub>2</sub> TSP, PM<sub>2.5</sub> and PM<sub>10</sub></td></tr> <tr> <td>Location</td><td>Based on baseline results, at least two locations (upwind and downwind) prioritizing sensitive receptors.</td></tr> <tr> <td>Frequency</td><td>Quarterly</td></tr> <tr> <td>Duration</td><td>24 hours per point</td></tr> <tr> <td>Reference Threshold</td><td>IFC EHS Guidelines</td></tr> <tr> <td>Reporting</td><td>Quarterly report</td></tr> <tr> <td>Prerequisite</td><td>Discuss with EEAA and agree on details of this program</td></tr> </table> </li> </ul>  | Parameters | CO, SO <sub>2</sub> , NO <sub>2</sub> TSP, PM <sub>2.5</sub> and PM <sub>10</sub> | Location | Based on baseline results, at least two locations (upwind and downwind) prioritizing sensitive receptors. | Frequency | Quarterly | Duration | 24 hours per point | Reference Threshold | IFC EHS Guidelines | Reporting | Quarterly report | Prerequisite | Discuss with EEAA and agree on details of this program |
| Parameters                            | CO, SO <sub>2</sub> , NO <sub>2</sub> TSP, PM <sub>2.5</sub> and PM <sub>10</sub>  |            |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |
| Location                              | Based on baseline results, at least two locations (upwind and downwind) prioritizing sensitive receptors.  |            |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |
| Frequency                             | Quarterly  |            |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |
| Duration                              | 24 hours per point   |            |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |
| Reference Threshold                   | IFC EHS Guidelines   |            |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |
| Reporting                             | Quarterly report   |            |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |
| Prerequisite                          | Discuss with EEAA and agree on details of this program   |            |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |

|   |   |   |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |        |   |
|---|---|---|---|----------|---|-----------|-----------|----------|--------------------|---------------------|--------------------|-----------|------------------|--------------|--|--------|---|
|   | <table><tr><td>Review</td><td>As applicable based on project updates and as required for related parties (regulator, developer, lender, etc.)</td></tr></table>   | Review  | As applicable based on project updates and as required for related parties (regulator, developer, lender, etc.) |          |   |           |           |          |                    |                     |                    |           |                  |              |  |        |   |
|   | Review  | As applicable based on project updates and as required for related parties (regulator, developer, lender, etc.) |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |        |   |
|   | <div><div><div>▪</div><div>Noise (Minimum requirements):</div></div></div>  |   |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |        |   |
|   | <table><tr><td>Parameters</td><td>Noise (<math>L_{Aeq}</math>)</td></tr><tr><td>Location</td><td>Based on baseline results, at least two locations (upwind and downwind) prioritizing sensitive receptors.</td></tr><tr><td>Frequency</td><td>Quarterly</td></tr><tr><td>Duration</td><td>24 hours per point</td></tr><tr><td>Reference Threshold</td><td>IFC EHS Guidelines</td></tr><tr><td>Reporting</td><td>Quarterly report</td></tr><tr><td>Prerequisite</td><td>Discuss with EEAA and agree on details of this program</td></tr><tr><td>Review</td><td>As applicable based on project updates and as required for related parties (regulator, developer, lender, etc.)</td></tr></table> | Parameters  | Noise ( $L_{Aeq}$ )   | Location | Based on baseline results, at least two locations (upwind and downwind) prioritizing sensitive receptors. | Frequency | Quarterly | Duration | 24 hours per point | Reference Threshold | IFC EHS Guidelines | Reporting | Quarterly report | Prerequisite | Discuss with EEAA and agree on details of this program | Review | As applicable based on project updates and as required for related parties (regulator, developer, lender, etc.) |
|   | Parameters  | Noise ( $L_{Aeq}$ )   |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |        |   |
|   | Location  | Based on baseline results, at least two locations (upwind and downwind) prioritizing sensitive receptors.       |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |        |   |
|   | Frequency   | Quarterly   |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |        |   |
|   | Duration  | 24 hours per point  |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |        |   |
|   | Reference Threshold   | IFC EHS Guidelines  |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |        |   |
|   | Reporting   | Quarterly report  |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |        |   |
| Prerequisite  | Discuss with EEAA and agree on details of this program  |   |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |        |   |
| Review  | As applicable based on project updates and as required for related parties (regulator, developer, lender, etc.)   |   |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |        |   |
| <div><div><div>▪</div><div>Continuous Inspection and reporting by health and safety staff</div></div></div> |   |   |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |        |   |
| <div><div><div>▪</div><div>Quarterly air quality and noise monitoring report to EGH</div></div></div>       |   |   |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |        |   |
| Reporting Requirements  |   |   |   |          |   |           |           |          |                    |                     |                    |           |                  |              |  |        |   |

| Traffic and Transport Management Plan |   |
|---------------------------------------|---|
| Objective                             | Promotion of safe driving and vehicle management practices both onsite and offsite to protect workers and members of the public   |
| Responsibility                        | EPC Contractor and their subcontractors (construction phase)  |
| Spatial applicability                 | EGH Project site  |
| Guiding legislations and reference    | <div> <div> <div>■</div> <div>Local legislations:</div> <ul style="list-style-type: none"> <li>Traffic Law 66/1973 and its Amendments Law 121/2008</li> <li>Public Roads Law 84/1968</li> <li>Public Roads Works Law 140/1956</li> </ul> </div> <div> <div>■</div> <div>Lender requirements:</div> <ul style="list-style-type: none"> <li>EBRD PR 4, IFC PS 4, WBG EHS General Guidelines / EHS Guidelines for Wind Energy</li> </ul> </div> </div>   |
| Required action/planning              | <div> <div> <div>■</div> <div>Identification of project traffic requirements related to wind turbines, equipment/machinery/materials, project workers and other based on a monthly basis.</div> </div> <div> <div>■</div> <div>Inclusion of a transport plan in specific for the wind turbines that studies the entire route of transportation.</div> </div> <div> <div>■</div> <div>Identification of types of vehicles to be utilized.</div> </div> <div> <div>■</div> <div>Identify in detail procedures for onsite management of traffic. This could include but not limited to: (i) optimization of internal traffic layout so that delivery and other vehicles will be able to access site easily; (ii) identification of requirements for controlling access to the site (e.g. security checkpoint, registration, etc.); (iii) providing appropriate lighting for roads and pedestrian walk and ensure they are segregated; (iv) utilization of appropriate and sufficient traffic signs onsite (e.g. speed limits); (v) barricading of open trenches and excavated pits; (vi) utilization of banksmen and flaggers and other.</div> </div> <div> <div>■</div> <div>Identify requirements to be adhered to and enforced on all haulage suppliers.</div> </div> <div> <div>■</div> <div>Identification of a code of conduct to be adhered to and enforced on all drivers in the Project.</div> </div> <div> <div>■</div> <div>Identification of speed limits onsite and identification of all traffic signage requirement onsite.</div> </div> </div> |

|                         |  |
|-------------------------|--|
|                         | <ul style="list-style-type: none"> <li>Identification of a procedure for management of onsite/offsite traffic accidents.</li> <li>Reflect the procedural actions for traffic management in: (i) induction training material; and (ii) repeated/refresher Toolbox Talks (TBT).</li> <li>Identify Key Performance Indicators (KPI) for implementation of plan.</li> <li>Identify roles and responsibilities for implementation of plan.</li> </ul> |
| Monitoring requirements | <ul style="list-style-type: none"> <li>Continuous inspection and reporting by EHS staff</li> </ul>   |
| Reporting Requirements  | <ul style="list-style-type: none"> <li>Monthly update report on implementation of required action/planning requirements to EGH</li> </ul>  |

| <b>Worker Influx and Accommodation Plan</b> |   |
|---|---|
| Objective                                   | Define minimum health and safety standards and principles for worker accommodation and ensure impacts on community health and safety from worker influx are managed and controlled.   |
| Responsibility                              | EPC Contractor and their subcontractors (construction phase)  |
| Spatial applicability                       | Offsite (Ras Gharib city)   |
| Guiding legislations and reference          | <ul style="list-style-type: none"> <li>Local legislations: <ul style="list-style-type: none"> <li>Minister of Labour Decree No. 200/2003</li> <li>Minister of Labour Decree 153/2003</li> </ul> </li> <li>Lender requirements: <ul style="list-style-type: none"> <li>EBRD PR 2, IFC PS 2, WBG EHS General Guidelines / EHS Guidelines for Wind Energy</li> <li>IFC's and EBRD's Worker Accommodation Guidance Note</li> </ul> </li> </ul>  |
| Required action/planning                    | <ul style="list-style-type: none"> <li>Identification of the number of workers expected per month and anticipated accommodation requirements of all involved subcontractors.</li> <li>Identification of accommodation facilities in Ras Gharib city (availability of hotels, suites, apartments, and other).</li> <li>Assessment of worker influx to Ras Gharib city at a cumulative level taking into account other developments in the Project area with parallel and/or overlapping construction schedule and which require accommodation (e.g. other wind farm developments) to include pressure on infrastructure, services and utilities.</li> <li>Identify in detail procedures for accommodation to include but not limited to: (i) number of beds per person; (ii) maximum occupants per room; (iii) separate rooms for male/female occupants; (iv) requirements for ensuite bathroom/toilet, ventilation, designated eating areas, waste facilities; (v) ensuring high degree of safety and security, including information on evacuation procedures and other.</li> <li>Identification in detail of a medical examination program for all workers.</li> <li>Identification of awareness raising material for communicable diseases.</li> <li>Regular stakeholder engagement by CLO with local community regarding potential influx of workers from other regions.</li> <li>Identification of a Labour Code of Conduct as well as Accommodation Rules and Regulations.</li> <li>Reflect the procedural actions for worker accommodation management in: (i) induction training material; and (ii) repeated/refresher Toolbox Talks (TBT).</li> <li>Identify Key Performance Indicators (KPI) for implementation of plan.</li> <li>Identify roles and responsibilities for implementation of plan.</li> </ul> |
| Monitoring requirements                     | <ul style="list-style-type: none"> <li>Continuous inspection and reporting by EHS staff</li> </ul>  |
| Reporting Requirements                      | <ul style="list-style-type: none"> <li>Monthly update report on implementation of required action/planning requirements to EGH</li> </ul>   |

| <b>Occupational Health and Safety Plan</b> |   |
|--|---|
| Objective                                  | Establish procedures that describe the manner in which activities will be carried out to protect and promote workers health and safety and safeguarding of personnel and property   |
| Responsibility                             | EPC Contractor and their subcontractors (construction phase)<br><br>O&M Contractor and its subcontractors (operation phase)   |
| Spatial applicability                      | EGH Project site  |
| Guiding legislations and reference         | <ul style="list-style-type: none"> <li>▪ Local legislations: <ul style="list-style-type: none"> <li>- Environmental Law 4/1994 and its Amendments Law 9/2009</li> <li>- Labour and Workforce Safety Law 12/2003</li> <li>- Minister of Labour Decree 200/2003 and Decree 458/2007</li> </ul> </li> <li>▪ Lender requirements: <ul style="list-style-type: none"> <li>- EBRD PR 2, IFC PS 2, WBG EHS General Guidelines / EHS Guidelines for Wind Energy</li> </ul> </li> </ul>  |
| Required action/planning                   | <ul style="list-style-type: none"> <li>▪ Inclusion of a Job Safety Analysis (JSA) and Risk and Hazard Assessment for work activities.</li> <li>▪ Identification of a Permit to Work System requirements and procedure.</li> <li>▪ Identification of a Lock Out-Tag Out System requirements and procedures.</li> <li>▪ Identification of occupational health and safety signage requirements to be implemented.</li> <li>▪ Identification of medical support requirements.</li> <li>▪ Identify in detail the occupational health and safety management procedures to be implemented for each work activity to include personnel protective equipment requirements; management measures, and other as applicable.</li> <li>▪ Identification of rest and sanitary facilities.</li> <li>▪ Identification of specialized technical training requirements as related to this plan and activities to be undertaken (e.g. training for working at height, electrical works, etc.).</li> <li>▪ Reflect the procedural actions for occupational health and safety in: (i) induction training material for workers; and (ii) repeated/refresher Toolbox Talks (TBT).</li> <li>▪ Identify Key Performance Indicators (KPI) for implementation of plan.</li> <li>▪ Identify roles and responsibilities for implementation of plan.</li> <li>▪ Development and implementation of a tracking system for injuries and incidents, using OSHA standards.</li> <li>▪ Recording statistics such as lost time incidents (LTIs), near misses, and first aid cases.</li> </ul> |
| Monitoring requirements                    | <ul style="list-style-type: none"> <li>▪ Continuous inspection and reporting by EHS staff</li> </ul>  |
| Reporting Requirements                     | <ul style="list-style-type: none"> <li>▪ Monthly update report on implementation of required action/planning requirements to EGH</li> </ul>   |

| <b>Emergency Preparedness and Response Plan</b> |   |
|---|---|
| Objective                                       | Establish a series of organizational, operational and preventive measures in the event of an emergency that are adapted to the circumstance of such situations, which in turn will ensure the safety of workers and property within the specific project site   |
| Responsibility                                  | EPC Contractor and their subcontractors (construction phase)<br><br>O&M Contractor and its subcontractors (operation phase)   |
| Spatial applicability                           | EGH Project site  |
| Guiding legislations and reference              | <ul style="list-style-type: none"> <li>▪ Local legislations: <ul style="list-style-type: none"> <li>- Environmental Law 4/1994 and its Amendments Law 9/2009</li> </ul> </li> <li>▪ Lender requirements: <ul style="list-style-type: none"> <li>- EBRD PR 4, IFC PS 2 and 4, WBG EHS General Guidelines / EHS Guidelines for Wind Energy</li> </ul> </li> </ul> |

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| Required action/planning | <ul style="list-style-type: none"> <li>▪ Inclusion of requirements for an emergency responder team that includes at a minimum first aiders and firefighters that receive appropriate and certified training.</li> <li>▪ Inclusion of requirements to undertake emergency drills in coordination with external emergency response services if required (e.g. civil defence, nearest hospital, etc.).</li> <li>▪ Identify in detail of emergency procedures to be implemented to include first actions, alerting emergency contacts, site evacuation, communicating with external emergency services.</li> <li>▪ Identification in details of emergency control measures to include but not limited to fire, personnel accidents, spillage, sandstorms, heat strokes, and other.</li> <li>▪ Identification of location of assembly points onsite.</li> <li>▪ Identification of emergency signs to be implemented onsite.</li> <li>▪ Reflect the procedural actions for emergency preparedness and response in: (i) induction training material for workers; and (ii) repeated/refresher Toolbox Talks (TBT).</li> <li>▪ Identify Key Performance Indicators (KPI) for implementation of plan.</li> <li>▪ Identify roles and responsibilities for implementation of plan to include establishment of an emergency committee and assigning roles to an emergency manager.</li> </ul> |
| Monitoring requirements  | <ul style="list-style-type: none"> <li>▪ Continuous inspection and reporting by EHS staff</li> </ul>   |
| Reporting Requirements   | <ul style="list-style-type: none"> <li>▪ Emergency Report (upon occurrence)</li> </ul>   |

| <b>Security Management Plan</b>    |  |
|------------------------------------|--|
| Objective                          | Identification of procedures for the overall management of security and asset-protection of the project site with specific regard for human rights.  |
| Responsibility                     | <p>EPC Contractor and their subcontractors (construction phase)</p> <p>O&amp;M Contractor and their subcontractors (operation phase)</p>   |
| Spatial applicability              | EGH Project site   |
| Guiding legislations and reference | <ul style="list-style-type: none"> <li>▪ Local legislations: <ul style="list-style-type: none"> <li>- Security Companies for Facilities Law 68/2015 amended by law 126/2015</li> </ul> </li> <li>▪ Lender requirements: <ul style="list-style-type: none"> <li>- EBRD PR 4, IFC PS 4, WBG EHS General Guidelines</li> <li>- The Voluntary Principles on Security and Human Rights</li> </ul> </li> </ul>   |
| Required action/planning           | <ul style="list-style-type: none"> <li>▪ Identification in detail of site security arrangements that will be implemented onsite to include security guards, fencing, CCTV, and other as applicable.</li> <li>▪ Identification of security operating procedures to include: (i) control of site access, and (ii) security force management to include security roles, provision and composition of security force, equipment requirement of security force, use of force, etc.</li> <li>▪ Identification of incident response procedure.</li> <li>▪ Development of a code of conduct and use of force policy.</li> <li>▪ Reflect the procedural actions for security management in: (i) induction training material; and (ii) repeated/refresher Toolbox Talks (TBT).</li> <li>▪ Include specialized training to security personnel to avoid use of excessive force.</li> <li>▪ Identify Key Performance Indicators (KPI) for implementation of plan.</li> <li>▪ Identify roles and responsibilities for implementation of plan.</li> </ul> |
| Monitoring requirements            | <ul style="list-style-type: none"> <li>▪ Continuous inspection and reporting by EHS staff</li> </ul>   |
| Reporting Requirements             | <ul style="list-style-type: none"> <li>▪ Monthly update report on implementation of required action/planning requirements to EGH</li> </ul>  |

| <b>Chance Find Procedure</b>       |   |
|------------------------------------|---|
| Objective                          | Establish a procedure to avoid or reduce adverse effects to undiscovered archaeological remains during the construction phase of the Project  |
| Responsibility                     | EPC Contractor and their subcontractors (construction phase)  |
| Spatial applicability              | EGH Project site  |
| Guiding legislations and reference | <ul style="list-style-type: none"> <li>▪ Local legislations: <ul style="list-style-type: none"> <li>- Archaeology Protection Law 117/1983 and its Amendments Law 3/2010</li> </ul> </li> <li>▪ Lender requirements: <ul style="list-style-type: none"> <li>- EBRD PR 8, IFC PS 8, WBG EHS General Guidelines</li> </ul> </li> </ul>   |
| Required action/planning           | <ul style="list-style-type: none"> <li>▪ Identification of procedures to be implemented to include onsite notification measures, onsite management measures (e.g. delineation and marking of site, etc.), communication with relevant authority, etc.</li> <li>▪ Reflect the procedural actions for chance find in: (i) induction training material for workers; and (ii) repeated/refresher Toolbox Talks (TBT).</li> <li>▪ Identify Key Performance Indicators (KPI) for implementation of plan.</li> <li>▪ Identify roles and responsibilities for implementation of plan.</li> <li>▪ Communication of any identification shall be made to the following: <ol style="list-style-type: none"> <li>1. Supreme Council of Antiquities: <ul style="list-style-type: none"> <li>▪ Address: 3 Al-Adel Abubakr Street, Zamalek, Cairo, Egypt.</li> <li>▪ Phone Number: (+20) 2 2735 3964</li> </ul> </li> <li>2. Red Sea and Suez Antiquities Inspection Office: (Contact to be confirmed)</li> </ol> </li> </ul> |
| Monitoring requirements            | <ul style="list-style-type: none"> <li>▪ Continuous inspection and reporting by EHS staff</li> </ul>  |
| Reporting                          | <ul style="list-style-type: none"> <li>▪ Chance find report (upon occurrence)</li> </ul>  |

| <b>Worker Grievance Mechanism</b>  |   |
|------------------------------------|---|
| Objective                          | A robust and comprehensive procedure to capture, document, resolve and close out any worker complaint, whether classified as grievances or not.   |
| Responsibility                     | <p>EPC Contractor and their subcontractors (construction phase)</p> <p>O&amp;M Contractor (operation phase)</p>   |
| Spatial applicability              | EGH Project site  |
| Guiding legislations and reference | <ul style="list-style-type: none"> <li>▪ Local legislations: <ul style="list-style-type: none"> <li>- Ministry of Labour Decree 185/2003</li> </ul> </li> <li>▪ Lender requirements: <ul style="list-style-type: none"> <li>- EBRD PR 2, IFC PS 2, WBG EHS General Guidelines</li> </ul> </li> </ul>  |
| Required action/planning           | <ul style="list-style-type: none"> <li>▪ Identification of a step-by-step process and guideline to ensure that every complaint/grievance made by workers are registered, documented and fully addressed</li> <li>▪ The overall outline/structure of the grievance mechanism will be as follows: <ul style="list-style-type: none"> <li>- Workers will be allowed to lodge grievances through various platforms and channels to include grievance boxes distributed onsite, telephone, face to face meetings with responsible personnel, workers representatives and unions. Contact details for all such channels will be identified and provided in detail.</li> <li>- Anonymous lodging of grievances will be allowed.</li> <li>- All grievances will be recorded and a case handler will be assigned and whom will be determined at a later stage.</li> <li>- All grievances will be handled in the shortest possible period. The first approach will be to inform the worker within the first 24 hours after receiving the grievance. The worker will be</li> </ul> </li> </ul> |

|                        |  |
|------------------------|--|
|                        | <p>informed within 7 working days on whether or not the grievance proceeds and what the next steps will be.</p> <ul style="list-style-type: none"> <li>- Once a resolution has been agreed or a decision made, the case handler will monitor the implementation of the response.</li> <li>- After the implementation of an agreed resolution has been verified the grievance close-out will take place. It will entail reaching a unanimous agreement, clearly communicated to avoid misunderstandings.</li> <li>- A close-out report will be prepared with evidence to support closure (e.g. photos).</li> </ul> <ul style="list-style-type: none"> <li>▪ Reflect the procedural actions for worker grievance mechanism in: (i) induction training material for workers; and (ii) repeated/refresher Toolbox Talks (TBT)</li> <li>▪ Identify Key Performance Indicators (KPI) for implementation of plan</li> <li>▪ Identify roles and responsibilities for implementation of plan</li> </ul> |
| Reporting Requirements | <ul style="list-style-type: none"> <li>▪ Monthly update summary report on worker grievances and resolutions</li> </ul>   |

| <b>Labour Management Plan</b>      |  |
|------------------------------------|--|
| Objective                          | Ensure fair labor practices, promote worker welfare, and uphold international labor standards across all project phases. This includes creating a safe, equitable, and inclusive working environment for all workers.  |
| Responsibility                     | <p>EPC Contractor and subcontractors (construction phase).</p> <p>O&amp;M Contractor and subcontractors (operation phase).</p>   |
| Spatial applicability              | EGH Project site and offsite   |
| Guiding legislations and reference | <ul style="list-style-type: none"> <li>▪ Local labour laws and regulations: <ul style="list-style-type: none"> <li>- Ministry of Labour Decree 185/2003</li> </ul> </li> <li>▪ Lender requirements: <ul style="list-style-type: none"> <li>- EBRD PR 2, IFC PS 2, ILO Core Labour Standards</li> </ul> </li> </ul>   |
| Required action/planning           | <ul style="list-style-type: none"> <li>▪ Develop employment contracts detailing job responsibilities, wages, benefits, duration, and other terms in compliance with local laws.</li> <li>▪ Ensure wages meet or exceed minimum wage standards, are fair, and are paid on time, as per contract terms.</li> <li>▪ Provide equal employment opportunities regardless of gender, race, religion, or other personal characteristics.</li> <li>▪ Prohibit child labour and forced labour under any circumstances.</li> <li>▪ Ensure fair treatment of foreign workers, prohibiting document confiscation and recruitment fees.</li> <li>▪ Provide casual and day workers with proper contracts and ensure their inclusion in medical, social, and life insurance schemes.</li> <li>▪ Offer all workers legally mandated leaves (e.g., annual, sick, maternity, bereavement) and adhere to standard working hours, including fair overtime compensation.</li> <li>▪ Maintain a safe workplace with sanitation facilities, potable water, food storage, eating areas, and suitable accommodations.</li> <li>▪ Establish an effective grievance mechanism accessible to all workers for raising workplace concerns.</li> </ul> |
| Reporting Requirements             | <ul style="list-style-type: none"> <li>▪ Monthly update summary report on labour management</li> </ul>   |

|   |
|---|
| <b>Procurement and Supply Chain Management Plan</b> |
|---|

|                                    |  |
|------------------------------------|--|
| Objective                          | Define the approach to supply chain management, incorporating environmental, social, and quality considerations, maximizing the use of local goods and services to foster local business and community development.  |
| Responsibility                     | EPC Contractor and subcontractors (construction phase).<br>O&M Contractor and subcontractors (operation phase).  |
| Spatial applicability              | <p>EGH Associated facilities will mainly include the Overhead Transmission Line (OHTL). EETC will be responsible for offsite connection works from the onsite substation to the National Grid that will be through a 220 kV OHTL. The OHTL has a length of approximately 1.5 km and connects to the existing HV network via a connection pylon. It is important to note that at this stage limited details are made available on the OHTL specifications (height, number of electrical towers, etc.).</p> <p>Project site and offsite</p>                        |
| Guiding legislations and reference | <ul style="list-style-type: none"> <li>▪ Local labour laws and regulations:               <ul style="list-style-type: none"> <li>- Ministry of Labour Decree 185/2003</li> <li>- Labour and Workforce Safety Law 12/2003</li> <li>- Environmental Law 4/1994 and its Amendments Law 9/2009</li> </ul> </li> <li>▪ Lender requirements:               <ul style="list-style-type: none"> <li>- EBRD PR 1 and PR 2, IFC PS 1 and PS2</li> </ul> </li> </ul>  |
| Required action/planning           | <ul style="list-style-type: none"> <li>▪ Establish clear standards for procuring goods and services</li> <li>▪ Prioritize local businesses and services</li> <li>▪ Screen and monitor third-party vendors providing services, materials, and products</li> <li>▪ Provide training and support to local suppliers and contractors</li> <li>▪ Ensure all suppliers comply with international labor standards</li> <li>▪ Ring fencing contracts for local businesses</li> <li>▪ Ensure no child labour, forced labour throughout the entire supply chain</li> </ul> |
| Reporting Requirements             | <ul style="list-style-type: none"> <li>▪ Monthly update summary report on supply chain management</li> </ul>   |

## 6 FRAMEWORK FOR LABOR MANAGEMENT

This framework applies to all personnel engaged in the construction of the EGH 200MW Wind Farm including:

- Employees directly employed by the Developer.
- EPC Contractor personnel
- Subcontractors working under the EPC Contractor
- Casual workers and day laborers

### 6.1 Human Resources (HR) Policy

EGH is committed to treating its employees and service providers fairly, equally and without prejudice. This means respecting all individuals, regardless of ethnic origin, creed, age or gender. To achieve this goal, the company is committed to the following:

- Operating in strict compliance with all applicable national and local laws and regulations including to those related to labour, employment, and workplace safety;
- Meeting internationally-accepted industry best practice requirements of the relevant International Financing Institutions (IFIs) to include in specific the IFC Performance Standards and EBRD Performance Requirements
- Providing safe work places and fair terms and conditions of employment;
- Being an equal opportunities employer, with no preference on the basis of personal characteristics such as age, race, nationality, ethnicity, sexual orientation, gender or religion;
- Positively encouraging the development of all our employees by providing a working environment that fosters new talent and ways of thinking;
- Offering competitive terms and conditions of employment in accordance with applicable national and local laws and promoting the development and best use of individual talents;
- Ensuring that all employees and contractors work in safe conditions where suitable procedures are provided and maintained;
- Ensuring that all employees and subcontractors have ready access to sanitation facilities, potable water, food and/or food preparation, storage and eating facilities, and suitable accommodation and welfare facilities;
- Never using underage or child labour and never employing those under the age of 18;
- Never using any forced or compulsory labour;
- Not tolerating discrimination, harassment, or hostile and offensive work environment;
- All employees have the right to freely join trade unions, where such rights are recognized by law;
- Accepting, offering, or soliciting any bribe or kickback no matter how large or small is considered strictly prohibited; and
- Ensuring that the company and all involved subcontractors are made aware of this Policy.

EGH will monitor and review this Policy on a regular basis to ensure that it continues to support and encourage a high standard of human resources performance.

## 6.2 Labour Management

EGH is committed to adhering to the below principles and requirements on labor, employment and workplace safety. Such requirements should also be implemented and taken into account by all involved entities in the Project to include EPC Contractor, O&M Contractor and all involved subcontractor to these entities.

### **Local and International Requirements**

- EGH will operate in strict compliance with all applicable national and local laws and regulations related to labour, employment, and workplace safety.
- EGH will meet all internationally-accepted industry best practices requirements of the relevant International Financing Institutions (IFIs) related to labour, employment and workplace safety to include in particular “IFC Performance Standard 2: Labour and Working Conditions” and EBRD Performance Requirement 2: Labour and Working Conditions”.

### **Working Conditions**

- All workers will be provided with a contract which will include details on: (i) nature, type of work and job responsibilities; (ii) wage and time of payment; (iii) compulsory payments such as medical, life and social insurance and other benefits to include in cash and in kind as agreed; (iv) contract duration; (vii) other information as may be required. In addition, where workers are illiterate, these contracts will be explained verbally before signature.
- Wages will be fair (i.e. that meets basic needs to maintain a safe, decent standard of living) and based on qualifications and competencies, professional experiences, allocated roles and job responsibilities, wages at equivalent positions, and other factors as appropriate. Such criteria will be applied to all workers to include migrant workers and women in specific. In any case, the determined wage shall not be less than the minimum wage in accordance with local laws and regulations. More details can be found in Annex 1 regarding the determination and estimates of fair wages in the project area for semi-skilled workers, unskilled workers, casual workers and labourers.
- All wages will be paid on time and directly to the worker as set in the contract terms.
- All workers will be entitled to leaves (to include annual leaves, sick leaves, maternity leaves, bereavement leave) in accordance with local labour laws and legislations.
- All workers should be required to work in accordance with working hours set within local labour laws and legislations taking into account rest or break hours. In addition, working extra hours beyond those specific above is allowed (with the consent of the worker), however in this case the employee will be entitled for overtime hours as agreed in the contract.

### **Foreign Workers**

- Engagement of foreign workers will adhere to requirements identified through this section to include specifically contract, wages, leaves, working hours, non-discrimination and equal opportunity, child labour, young workers, forced labour, etc.
- Confiscation of personal documents of the foreign workers by their employers is strictly forbidden.
- No fees, commissions or deductions from salary should be asked from foreign workers upon promise of employment at the Project.

### **Casual and Day Workers**

- Engagement of casual and day workers will adhere to requirements identified through this section to include specifically contract, wages, leaves, working hours, non-discrimination and equal opportunity, child labour, young workers, forced labour, etc.

- In specific, it will be ensured that all casual and day workers are covered by social, life and medical insurance as appropriate and they will be informed on this as part of recruitment process through inclusion in contracts and verbal explanation.

#### **Non-Discrimination and Equal Opportunity**

- EGH is committed to being an equal opportunity employer and will not practice any discrimination based on personal characteristics – this includes gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disability, age, or sexual orientation. In addition, EGH has no tolerance for harassment, intimidation, exploitation or hostile and offensive work environment.
- The above will apply to the entire work cycle to include: recruitment and hiring, compensation (wages and benefits), working conditions and terms of employment, assignment of jobs, termination of employment, and disciplinary actions.

#### **Child Labor**

A child is considered any person less than 18 years of age. Associated facilities will mainly include the Overhead Transmission Line (OHTL). EETC will be responsible for offsite connection works from the onsite substation to the National Grid that will be through a 220 kV OHTL. The OHTL has a length of approximately 1.5 km and connects to the existing HV network via a connection pylon. It is important to note that at this stage limited details are made available on the OHTL specifications (height, number of electrical towers, etc.).

- is committed to never using child labour the project development.

#### **Forced Labor**

- EGH is committed to never using any forced or compulsory labour. Forced labour is any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty.

#### **Workers Organization**

- EGH recognizes workers' rights to form and to join workers' organizations of their choosing without interference and to bargain collectively.
- EGH is committed to allowing all employees to form or join workers' organization without interference and to bargain collectively in compliance with Egyptian laws.

#### **Health and Safety**

- EGH is committed to providing a safe work place that ensures all employees and contractors work in safe conditions where suitable procedures are provided and maintained.
- EGH is committed to ensuring all employees and subcontractors have ready access to sanitation facilities, potable water, food and/or food preparation, storage and eating facilities, and suitable accommodation and welfare facilities.

#### **Worker Grievance Mechanism**

- All works must have access to an effective grievance mechanism that is easily accessible to raise any workplace concerns. The mechanism must address concerns promptly, using an understandable and transparent process that provides timely feedback, without any retribution.

## 7 ESHS MEETINGS, TRAINING, INSPECTION AND MONITORING REQUIREMENTS

This section identifies the overall requirements that will be implemented for ESHS meetings, training, inspection and monitoring during the construction and operation phase.

### 7.1 ESHS Meetings

The following identifies the ESHS meetings that will be undertaken for the Project throughout the construction and operation phase.

#### Weekly Meetings

During construction, a weekly ESHS meeting must be organized by the EPC Contractor and subcontractors' HSE Manager/Officers (as applicable). EPC Contractor will notify EGH and OE team on the time and date of meeting for relevant personnel to attend, if required. The agenda of these meetings shall cover at least the following items:

- Summary of items addressed at the previous meeting and determination whether they have been solved or not
- ESHS incidents, near misses or situations at risk identified during the previous week
- Special resources needed by EPC Contractor and subcontractors for coming week, especially in terms of safety equipment and supervision
- Specific awareness communication to implement onsite
- Training needs
- Personal Protective Equipment (PPE) requirements

The weekly ESHS meetings may be combined with other meetings (e.g. weekly coordination meeting) as far as the above topics are discussed and addressed and the presence of the required participants is ensured. EPC Contractor is required to maintain minutes of meeting and attendees register.

During the operation phase, no weekly ESHS meetings are required.

#### Monthly Meetings

During construction, the monthly ESHS meeting is organized by the EGH Construction Manager and involves the following personnel (as appropriate):

- EGH ESHS Manager

EGH Associated facilities will mainly include the Overhead Transmission Line (OHTL). EETC will be responsible for offsite connection works from the onsite substation to the National Grid that will be through a 220 kV OHTL. The OHTL has a length of approximately 1.5 km and connects to the existing HV network via a connection pylon. It is important to note that at this stage limited details are made available on the OHTL specifications (height, number of electrical towers, etc.).

- CLO
- OE Team as applicable
- EPC Contractor Project Manager
- EPC Contractor HSE Manager and HSE Site Supervisors
- Contractor and subcontractors HSE Managers/Officers as applicable

The agenda of these meetings shall cover at least the following items:

- Summary of the items addressed at the previous meeting and determination whether they have been solved or not
- Discussion on work assignments (if they have changed), equipment placement if it is variable, and ensure work flow is efficient and safe
- Conditions of the work place to include housekeeping, hygiene, hazards, etc.
- Overview of accident/incident trends
- ESHS training program
- New and outstanding safety issues
- Audits and inspections outcomes (as applicable)
- Accidents (type, severity, frequency, etc.)
- Workers' grievances and their handling through the worker grievance mechanism

Throughout the monthly ESHS meeting, minutes of meeting will be undertaken by the EPC Contractor and shall be taken and circulated after the meeting to attendants. In addition, attendees register will also be maintained.

During operation, monthly ESHS meetings will be undertaken in a similar approach to the above that will involve O&M Contractor.

## 7.2 ESHS Training

To achieve the approach to ESHS management, all personnel will receive the required training. Training will not be undertaken as a one-off but instead will be continually refreshed as part of on-going site training programs focused on the training needs of construction personnel. Training will be provided for all new recruits and continual refresher courses will be established for staff to attend as needed.

The following identifies the ESHS meetings that will be undertaken for the Project throughout the construction and operation phase.

### Basic Visitor Safety Induction

Any visitor shall receive a basic safety induction prior to going on site. Each person who completes the induction will acknowledge by signing attendance sheet. This induction shall cover at least the following items:

- Site specific hazards awareness
- PPE instructions
- Basic safety rules to comply with
- Procedure to follow in case of emergency

The basic visitor safety induction training for all visitors will be delivered by EPC Contractor's HSE Manager or EGH's ESHS Manager (during construction) and O&M Contractor's HSE Manager or EGH's ESHS Manager (during operation). In addition, event attendance data sheet shall be signed and provided.

### Site Induction Training

All construction and operation staff members will attend an in-house site induction training course. This will be delivered in a specific meeting room on the Project site and in a consistent structure, irrespective of the staff designations attending. The main objective of this type of training is to provide:

- A general understanding of the ESHS risks associated with the construction/operation activities proposed
- Local, national and international requirements
- Clarification of the ESHS Policy and its practical implementation, stressing that it carries implications for the working methods and responsibilities for all employees

The site induction training will be delivered by the EPC Contractor's HSE Manager (during construction) and O&M Contractor HSE Manager (during operation) to all staff before they commence work on site. Workers will not be allowed to start working onsite until they have received the site induction training. As a minimum, the induction will include but not be limited to:

- General introduction and purpose and objectives of the ESHS plans
- The reason why the requirements set out in the ESHS plans are important
- The requirements for due diligence and duty of care
- Key ESHS contacts, roles and responsibilities
- Methods for implementing ESHS controls included within the plans
- Procedure for reporting incidents
- Details of site emergency and response plan
- Workers' grievance mechanism

Signed attendance sheet shall be retained.

#### Emergency Response Training

A standalone Emergency Preparedness and Response Plan is required to be prepared by EPC Contractor (during construction), and O&M Contractor (during operation). The Emergency Preparedness and Response Plan should address specific requirements for emergency response training.

#### Regular Tool-Box Talk (TBT)

The EPC Contractor's HSE Manager (during construction) and O&M Contractor's HSE Manager (during operation) will be responsible to conduct regular Tool-Box ESHS meetings with their respective crews and subcontractors' crews as applicable. Topics and frequency are developed by the HSE Manager of the EPC Contractor and distributed regularly. Signed attendance sheet shall be retained. The scope of the TBT shall be identified within each of management plans identified in "Chapter 5".

#### Other Training Requirements

There are other specific training requirements that must be adhered to and undertaken by the EPC Contractor's HSE Manager (during construction) and O&M Contractor's HSE Manager (during operation) and which are related to specific topics as applicable. This includes for example specific training for Occupational Health and Safety (OHS), specific training for workers handling waste, etc. Those have been identified in "Chapter 5" earlier.

#### ESHS Bulletin Board

A bulletin board will be installed at all sites where employees congregate as applicable. All other locations will have the same information available for employee's review on demand. Bulletin board information is as follows:

- Map denoting the route to the nearest emergency care facility
- Emergency communication procedures
- List of the most up-to-date ESHS plans and their location
- A sign indicating the number of hours worked since last lost workday incident
- Safety and health warning posters
- Safety Alert

### **7.3 ESHS Inspection and Monitoring**

ESHS inspection and monitoring will be carried out to ensure compliance with national and international best practice requirements as set out in the ESHS plans as appropriate. A three-tiered approach will be applied to the monitoring of the Project performance, as follows:

- Daily Site Tours to be undertaken by EPC Contractor (during construction) and O&M Contractor (during operation)
- Weekly Site Inspection to be undertaken by EPC Contractor (during construction) and O&M Contractor (during operation)
- Audits to be undertaken by EGH (discussed in details in “Chapter 9”).

#### Daily Site Tours

The EPC Contractor’s HSE Manager and O&M Contractor’s HSE Manager will be required to undertake a daily safety inspection and monitoring at the site. He/she shall prepare a daily observation report stating therein the corrective measures on observed safety deficiencies, unsafe acts and conditions. The observations shall be communicated to the concerned partners and subcontractor for their action. Copies of the daily inspection reports shall be kept on site by the HSE Managers and provided to EGH as required.

#### Weekly Site Inspections

It is the responsibility of the EPC Contractor’s HSE Manager and O&M Contractor’s HSE Manager to carry out weekly site inspections. These will be carried out through a weekly site inspection checklist.

The checklists will be used as the primary tool for identifying any non-compliance. The non-compliance procedure will be followed and implemented. Hard copies of the checklists will be printed and completed by the HSE Managers during the inspection of the site.

The inspections will be used to ensure that all parties (including contractor and subcontractors) are fully implementing the management procedures outlined within the ESHS plans.

The information collected during the weekly site inspections will be made available to EGH as required.

### **7.4 ESHS Reporting and Records**

Based on all of the above the table below provides a summary of all the ESHS requirements discussed throughout this chapter along with the reporting and record keeping requirements. The table below identifies the requirements for EGH, EPC Contractors and O&M Contractor.

The following reports and records will be stored and maintained onsite at all time.

**Table 5: ESHS Reporting and Records**

| No.      | Developer/EGH  |                          | EPC Contractor                                       |                         | O&M Contractor                                       |                         |
|----------|--|--------------------------|--|-------------------------|--|-------------------------|
|          | ESHS Item  | Report/Record            | ESHS Item  | Report/Record           | ESHS Item  | Report/Record           |
| <b>1</b> | <b>ESHS Meetings</b>                                 |                          |  |                         |  |                         |
| 1.1      | Attend weekly ESHS meetings                          | N/A                      | Overall management of weekly ESHS meetings           | Minutes of meeting      | N/A  | N/A                     |
| 1.2      | Overall management of monthly ESHS meetings          | N/A                      | Attend monthly ESHS meetings                         | Minutes of meeting      | Attend monthly ESHS meetings                         | Minutes of meeting      |
| <b>2</b> | <b>ESHS Training</b>                                 |                          |  |                         |  |                         |
| 2.1      | Basic Visitor Safety Induction Training for visitors | Signed attendance sheets | Basic Visitor Safety Induction Training for visitors | Signed attendance sheet | Basic Visitor Safety Induction Training for visitors | Signed attendance sheet |

|          |   |                                   |   |                                   |   |                                   |
|----------|---|-----------------------------------|---|-----------------------------------|---|-----------------------------------|
| 2.2      | General Site Induction Training                                   | Signed attendance sheets          | General Site Induction Training                                   | Signed attendance sheets          | General Site Induction Training                                   | Signed attendance sheets          |
| 2.3      | Emergency Response Training                                       | Signed attendance sheets          | Emergency Response Training                                       | Signed attendance sheets          | Emergency Response Training                                       | Signed attendance sheets          |
| 2.4      | Regular Tool Box Talks  | Signed attendance sheets          | Regular Tool Box Talks  | Signed attendance sheets          | Regular Tool Box Talks  | Signed attendance sheets          |
| 2.5      | Other Specialized Trainings (e.g. Occupational Health and Safety) | Signed attendance sheets          | Other Specialized Trainings (e.g. Occupational Health and Safety) | Signed attendance sheets          | Other Specialized Trainings (e.g. Occupational Health and Safety) | Signed attendance sheets          |
| <b>3</b> | <b>ESHS Inspection and Monitoring</b>                             |                                   |   |                                   |   |                                   |
| 3.1      | Daily observation   | Daily Observation Reports         | Daily observation   | Daily Observation Reports         | Daily observations  | Daily Observation Reports         |
| 3.2      | Weekly Site Inspections   | Weekly site inspection checklists | Weekly Site Inspections   | Weekly site inspection checklists | Weekly Site Inspections   | Weekly site inspection checklists |

## 8 AUDITING

### 8.1 Environment, Health and Safety (EHS) Audit

#### Construction Phase

During construction, EGH Associated facilities will mainly include the Overhead Transmission Line (OHTL). EETC will be responsible for offsite connection works from the onsite substation to the National Grid that will be through a 220 kV OHTL. The OHTL has a length of approximately 1.5 km and connects to the existing HV network via a connection pylon. It is important to note that at this stage limited details are made available on the OHTL specifications (height, number of electrical towers, etc.).

will undertake an Environmental, Health and Safety (EHS) audit. The objective will be to ensure EPC Contractor's and subcontractor's compliance with the relevant EHS requirements related to the Project, including in particular the following:

- Environmental and Social Impact Assessment (ESIA) and associated Environmental and Social Management Plan (ESMP)
- IFC 2012 Performance Standards
- EBRD Performance Requirements
- World Bank Group (WBG) General EHS Guidelines, Wind Energy EHS Guidelines
- National Egyptian EHS laws, regulations and standards

The EHS audit will be undertaken by the EGH ESHS Manager on a quarterly basis. An EHS audit checklist will be prepared taking into account the following criteria:

- |   |  |
|---|--|
| ▪ Overall EHS Onsite Management (documentation control, onsite team, training, meetings, inspection, monitoring, reporting, etc.) | ▪ Waste management (solid waste, wastewater and hazardous waste) |
| ▪ Hazardous material management   | ▪ Occupational health and safety                                 |
| ▪ Archaeology and cultural heritage (related to chance find procedures)   | ▪ Traffic and transport management                               |
| ▪ Emergency preparedness and response   | ▪ Air quality and noise  |
| ▪ Water management  |  |

The audit will be based on: (i) site visit and inspections; (ii) EHS documentation review of EPC Contractor and subcontractors; and (iii) meeting/discussions with EPC Contractor's HSE team and subcontractor's team as applicable.

Based on the above, a quarterly EHS audit report will be prepared that will identify: (i) EHS observations and non-conformities; (ii) corrective actions require to resolve observations and non-conformities; (iii) identification of responsible entities for implementation of corrective actions; and (iv) timeline for implementation of corrective actions.

#### Operation Phase

A similar approach for the operation phase will be undertaken. The EHS audit will be undertaken by EGH ESHS Manager on a quarterly basis on the O&M Contractor for the project.

### 8.2 Human Resources (HR) Audit

#### Construction Phase

During construction, EGH will undertake a Human Resources (HR) audit. The objective will be to ensure EPC Contractor's and subcontractors' compliance with the relevant HR requirements related to the project to include in particular the following:

- EGH Framework for Labour Management (presented in "Chapter 6")
- IFC 2012 Performance Standards to include PS 2
- EBRD Performance Requirements to include PR 2
- National Egyptian EHS laws, regulations and standards related to HR

The HR audit will be undertaken by the EGH's ESHS Manager and/or CLO as well as the HR manager on a quarterly basis and an HR audit checklist will be prepared. The audit will be based on: (i) site visit and inspections; (ii) HR documentation review of EPC Contractor's and subcontractors' (e.g. HR Policy HR Manual, etc.); and (iii) meeting/discussions with EPC Contractors' HSE team and subcontractors' team as applicable.

Based on the above, a monthly HR audit report will be prepared that will identify: (i) HR observations and non-conformities; (ii) corrective actions require to resolve observations and non-conformities; (iii) identification of responsible entities for implementation of corrective actions; and (iv) timeline for implementation of corrective actions.

### **Operation Phase**

A similar approach for the operation phase will be undertaken. The HR audit will be undertaken on a quarterly basis on the O&M Contractor for the project.

## 9 CONTRACTOR AND SUBCONTRACTOR E&S MANAGEMENT

The ESHS Manual identifies clearly the roles and responsibilities that are expected from the EPC Contractor during the construction phase and O&M Contractor during the operation phase of the Project. This includes in particular the following as a minimum (and to be added based on specific needs identified):

- Prepare, implement and comply with the requirements of the Environmental & Social Management System as identified in “Section 3.3” and “Chapter 5”
- Appoint an HSE team headed by an HSE Manager as identified in “Chapter 2”
- Undertake and participate in ESHS meeting and undertake ESHS training and inspection/monitoring requirements as identified in “Chapter 7”
- Comply with labour management requirements as identified in “Chapter 6”

In addition, as discussed in “Section 3.3” earlier, the EPC Contractor and O&M Contractor will ensure that all involved subcontractors in the project are provided with the requirements of the ESHS of both EGH and the EPC Contractors/O&M Contractor and they will be required to implement and comply with ESHS requirements accordingly. In specific subcontractors will be required to:

- Implement and comply with ESHS requirements and conditions as detailed within the ESHS plans and procedures provided by the EPC Contractor and O&M Contractor;
- Develop and submit relevant ESHS documents and programs (plans and procedures) where required and as applicable for their scope of work. Such documents must be approved by the EPC Contractor and O&M Contractor; and
- Adhere to all applicable local laws, ordinances, statutes, rules, regulations, and codes governing ESHS as well as international standards (i.e. IFC and EBRD standards).

EGH will ensure that all ESHS requirements are enforced on the EPC Contractor and O&M Contractor through inclusion in contractual obligations. In addition, as discussed earlier in “Chapter 8”, EGH will undertake periodic audits to ensure that the EPC Contractor/O&M Contractor and all subcontractors involved in the Project during the construction and operation phase adhere to provisions of the ESHS Manual and Management system and its associated management plans.

Whether through audits or through any other source of information (e.g. grievance mechanism) it comes to the attention of EGH that the EPC Contractor/O&M Contractor or any of the subcontractors do not comply with the requirements, the following will apply:

- EGH will issue a non-compliance report which provides details on the non-compliance issue and justification.
- EGH will submit the report and notify the EPC Contractor/O&M Contractor
- EGH will require a corrective action report from the EPC Contractor/O&M Contractor which provides details on the incident, measures taken to rectify the situation and ensure that such an incident does not happen again.
- Depending on the severity of the non-compliance as determined by EGH, a written formal warning could be issued to the EPC Contractor/O&M Contractor.
- Should the non-compliance incident be repeated (and depending on the severity) a similar process to the above will be undertaken and another written formal warning will be issued.
- Should the non-compliance incident be repeated for a third time, discussions will be undertaken between EGH and the Project Manager to impose contractual and financial penalties on the EPC Contractor/O&M Contractor.

Finally, the EPC Contractor and all subcontractors are responsible for the immediate reporting of any material ESHS Incidents to EGH, the IESC and Lenders. In particular the following will be implemented by the EPC Contractor and all subcontractors:

- Establish an internal reporting mechanism to document EHSS incidents across all activities.
- Ensure all subcontractors adhere to the reporting framework.
- Notify EGH, the IESC and the Lenders immediately (within 24 hours) in case of a Material EHSS Incident.
- Submit a corrective action report (within 7 days) Contractor which provides details on the incident, measures taken to rectify the situation and to ensure that such an incident does not take place again.

## 10 MANAGEMENT OF CHANGE

Various changes to this manual and its associated management plans and documentation may be required during the Project in order to address foreseen or unforeseen conditions or situations in a manner that is consistent with EGH's obligations.

During the construction and operation phase, this identified Change Management procedure will be applied to structure the review and approval of identified changes to planned Project arrangements by EGH and, when required, regulatory authorities or Project lenders. This procedure will be applied to allow ESHS issues to be addressed as part of any significant changes to Project procedures, processes, design, or activities.

### 10.1 Scope of Environmental & Social Management System Changes

Changes may be temporary or permanent, related to Project activities, organization, personnel, ESHS plans and procedures, equipment, materials, health and safety, environmental or community / wider social issues.

Changes may be initiated by EGH, the Owner's Engineer and may also be requested by the EPC Contractor or O&M Contractor. In practice, during the construction and operation phase, the Change Management process is likely to be initiated by EGH or the Owner's Engineer and raised directly with the EGH ESHS Manager.

A Change Request may be generated at any time, for example, during audits, as a result of stakeholder grievances and other complaints, regulatory site visits or interaction with Lenders / Lenders representatives.

The Change Management process will apply when changes occur to any of the following activities or items:

- Alteration of environmental and social impacts management and monitoring measures
- ESHS MS manual, plans, procedures related to the Project
- Personnel changes, training or competency requirements.
- Organisational structure and/or individual ESHS roles and responsibilities
- ESHS protection equipment
- Project designs, re-designs, drawings or engineering processes
- The composition and properties of specified materials, chemicals or fuels
- Introduction of new operating or maintenance procedures or changes to existing procedures

### 10.2 Management of Change Steps

The process is based on the following key steps:

- Identification of item/situation potentially requiring change;
- Requests for Change Form submitted to EGH ESHS Manager defining:
  - Nature of the item/situation requiring change
  - Any impacts resulting from the change (e.g. safety, pollution, public grievance or other complaint); and
  - Any biophysical, social, economic, or health considerations.
- Once impacts are identified, a review should be made of the ESMP in place at the time of the change in order to assess if the mitigations it includes are sufficient to adequately manage the change and its impacts; if not sufficient, the ESMP should be modified/expanded to ensure that it can manage the impacts and risks that the change will bring in. If sufficient, then no further actions are required.
- EGH ESHS Manager will review proposed changes for compatibility as applicable:
  - Category 1 changes are approved by the EGH Construction/Operation Manager and EGH ESHS Manager (with additional consultation if required);

- Category 2 changes are approved by the EGH ESHS Manager (with additional specialist consultation if required) and then submitted to the Construction/Operation Manager for approval;
- Category 3 changes are agreed between the relevant HSE Officers, the relevant parties/ stakeholders (with additional consultation as required) and are then submitted for approval by the EGH ESHS Manager;

Category 4 changes are simply approved by the EGH Associated facilities will mainly include the Overhead Transmission Line (OHTL). EETC will be responsible for offsite connection works from the onsite substation to the National Grid that will be through a 220 kV OHTL. The OHTL has a length of approximately 1.5 km and connects to the existing HV network via a connection pylon. It is important to note that at this stage limited details are made available on the OHTL specifications (height, number of electrical towers, etc.).

- ESHS Manager or delegated authority.
- Review and approval by external stakeholders if/as required;
- Compliance with reporting and other obligations in the finance documents;
- Application for, and receipt of, any approvals required to implement the change under Egyptian laws and regulations or under permitting conditions;
- Implementation of the approved change, including communication to appropriate parties concerning the nature, scope and timing of the change; and
- Summary of project changes and status to be included in internal compliance reporting and/or in annual monitoring reports or equivalent to the appropriate regulatory authorities and lenders as appropriate.

### 10.3 Change Categorization

Table 6: Change Categorization and Actions Required

| Category               | Nature of Change  | Actions Required   |
|------------------------|---|--|
| 1<br>(Major Change)    | <p>Changes which are reasonably likely to result in:</p> <ul style="list-style-type: none"> <li>▪ Significant departure from the Project Description and/or a EGH ESHS Manual and/or a legal / Lender obligation;</li> <li>▪ Significant environmental and/or social impact(s) not identified;</li> <li>▪ Confirmation that a planned mitigation measure for addressing significant environmental and/or social impact(s) are not o predicted to be effective; or</li> <li>▪ Material amendment or supplement to the ESHS is necessary</li> </ul> | <p>EGH will notify relevant Egyptian Regulator/Agencies and/ or the Project Lenders within an appropriate timeframe (period as specified in law / the Lenders ESAP or as otherwise agreed).</p> <p>EGH Change Notice will define what change is required, the proposed implementation actions and associated timescale.</p> <p>No changes affecting material environmental and social matters will be implemented without prior Egyptian Agency / Facility Agent/ Lender approval, unless human health or the environment is at imminent risk of serious harm.</p> |
| 2<br>(Moderate Change) | <p>Changes which are reasonably likely to result in:</p> <ul style="list-style-type: none"> <li>▪ Departure from the Project Description and/or a EGH ESHS Manual requirement and/or a Egyptian legal / Lender obligation</li> <li>▪ New environmental and/or social impact(s) not identified</li> <li>▪ Modification to a planned mitigation measure for addressing</li> </ul>   | <p>EGH will notify the relevant Egyptian Agencies and/or the Project Lenders within an appropriate timeframe.</p> <p>If the Lenders consider that a Change should be re-categorized or that the proposed measures for managing or implementing it are inconsistent with the specified E&amp;S Standards, the Lenders through the Facility Agent and or Technical Advisors shall notify the Company within a reasonable time period. Thereupon EGH and the Lenders Technical Advisors / Facility Agent will make best</p>   |

|                          |  |  |
|--------------------------|--|--|
|                          | environmental and/or social impact(s).   | <p>endeavors to agree a solution. EGH will not implement the proposed Change until a mutually acceptable is agreed.</p> <p>If the Lenders Technical Advisors/ Facility Agent do not respond within an agreed period, EGH will assume that the proposed change is acceptable and will proceed as per plan</p> |
| 3<br>(Minor Change)      | Changes which do not fall within either of the above Categories 1 or 2, but which need to be notified to Egyptian Regulator / Agency or the Lenders. | EGH will notify the relevant Egyptian Agencies/ Stakeholders either in routine meetings or formal reports as appropriate. EGH will notify the any changes made during the course of the year in its Annual Monitoring Report or equivalent mechanism.  |
| 4<br>(Negligible Change) | Other non-material changes   | No notifications needed  |

## 11 ANNEX 1: FAIR WAGES

This annex provides an assessment of fair wages (living wages) for construction workers in the Red Sea Governorate for the wind farm project in Gabal El-Zeit. The assessment aligns with Egyptian labor laws, international standards (EBRD and IFC), and regional labor market conditions.

### 1. Methodology for Determining Fair Wages

Fair wages have been determined based on the following factors:

- **Egyptian Minimum Wage Regulations:** The latest decrees issued by the National Council of Wages (NCW) in Egypt.
- **Labor Market Data:** Wage benchmarks from local employment statistics, sectoral wage studies, and consultations with trade unions.
- **Cost of Living Adjustments:** Consideration of basic needs, inflation, and living expenses in the Red Sea region.
- **International Standards (IFIs):** Compliance with international best practices in setting fair wages.

### 2. Minimum Wage and Market Data

#### Local Market Analysis

Available data indicates that wages vary depending on skill level and job type, ensuring that the project remains competitive in the labor market.

- As per the National Wages Council of Egypt, the minimum wage for private sector workers has been set at EGP 7,000 per month, effective March 1, 2025.
- Market data suggests wage variations based on skill levels and job categories, ensuring competitiveness and workforce retention.

### 3. Wage Structure for Different Worker Categories

The following table outlines the proposed wage levels for various categories of workers involved in construction activities:

Table 7: Proposed Wage Structure for Different Worker Categories

| Worker Category             | Description   | Estimated Daily Wage (EGP) | Estimated Monthly Wage (EGP) |
|-----------------------------|---|----------------------------|------------------------------|
| <b>Semi-Skilled Workers</b> | Workers with basic technical skills, requiring minimal training.  | 320                        | 8,000                        |
| <b>Unskilled Workers</b>    | Workers with no specialized skills performing basic manual labor. | 280                        | 7,000                        |
| <b>Casual Workers</b>       | Workers employed on a short-term basis for specific tasks.        | 280                        | 7,000                        |
| <b>Day Laborers</b>         | Workers hired on a daily wage basis for on-demand labor needs.    | 28 per hour                | Variable                     |

#### 4. Budgetary Implications for Scatec and EPC Contractors

The implementation of fair wages will have financial implications for EFH and its EPC contractors and subcontractors. Key considerations include:

- **Contractor Selection:** Ensuring that EPC contractors align with fair wage policies in their employment practices.
- **Project Budget Adjustments:** Estimating the total wage cost impact on the project budget.
- **Compliance with International Funding Requirements:** Adhering to IFIs labor standards to ensure sustainable and ethical employment practices.

#### 5. Next Steps and Implementation Plan

- **Stakeholder Consultations:** Engaging with local labor representatives and authorities to validate wage levels.
- **Contractor Guidelines:** Establishing clear guidelines for EPC contractors to ensure fair wage compliance.
- **Monitoring and Reporting:** Implementing a wage monitoring system to track compliance with fair wage policies.

This annex serves as a baseline for determining fair wages in the Red Sea Governorate and outlines necessary considerations for contractor selection, budgeting, and compliance with IFIs standards. Further refinements will be made based on ongoing consultations and market assessments.

## 12 ANNEX 2: ID CONFISCATION OF FOREIGN WORKERS AND SECURITY MEASURES

- **Commitment to International Labor Standards and Prevention of Forced Labor Risks**
  - The project strictly adheres to EBRD Performance Requirement (PR) 2 and IFC Performance Standard (PS) 2, which prohibit employers from confiscating workers' personal identification documents, including passports, residency permits, and work permits.
  - All EPC contractors and subcontractors will be contractually obligated to ensure that foreign workers retain possession of their identification documents at all times, except for legally required administrative processes (e.g., visa renewals).
- **Security Measures and ID Retention at Site Entry Points**
  - It is acknowledged that the Egyptian Armed Forces, as part of national security procedures, may request temporary retention of ID documents for foreign workers when entering the site.
  - This is a government-mandated security measure and is not within the developer's direct control.
  - The project will engage with security authorities to ensure that such measures are proportionate, transparent, and do not lead to extended retention of documents beyond entry control purposes.
- **Mitigation Measures to Protect Foreign Workers' Rights**
  - Establishing Clear Protocols with Security Authorities:
    - The project will coordinate with security forces to ensure that ID retention is strictly limited to entry verification and that all documents are returned to foreign workers upon site exit each day.
    - No documents will be retained overnight or beyond the duration required for security checks.
  - Informing Workers of Their Rights:
    - Foreign workers will be clearly informed that any ID retention at entry points is a security protocol and not an employer-imposed requirement.
    - Workers will be explicitly prohibited from being coerced into handing over their passports or work permits to their employers.
  - Grievance Mechanism for Foreign Workers: A dedicated grievance mechanism will be made available for foreign workers to report any concerns related to ID confiscation or other potential labor rights violations.
  - Regular Audits and Compliance Monitoring: Independent labor audits will be conducted to ensure that contractors and subcontractors comply with labor protection standards, and that no coercive practices occur in relation to document retention.