

ENVIRONMENTAL AND SOCIAL ACTION PLAN

SCATEC - PROJECT OBELISK 1 GW SOLAR PV + BESS, NAGAA HAMMADI, EGYPT

A P R I L 2 0 2 5

ESAP#	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD ESR, IFC PS, AfDB OS, Best Practice)	Responsibility	Resources, Investment Needs	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
ESR1, PS1, OS1: Assessment and Management of Environmental and Social Impacts and Issues								
1.1	Obtain ministry of environment's approval for the 1GW solar photovoltaic (PV) facility and Battery Energy Storage System (BESS) and cascade its conditions into the construction and operation contracts, as well as the Project Environmental and Social Management System (ESMS).	Environmental and Social (E&S) risk management and legal compliance.	Environmental and Social Requirement (ESR) 1, PS1, OS 1 and legal requirement.	Company, with Consultant support.	Management Time	Prior to Financial Close.	Egyptian Environmental Affairs Agency (EEAA) approval.	
1.2	Scatec will make best efforts to ensure that an ESIA is completed for any of the associated facilities, such as the Overhead Transmission Lines (OHTL) to be established by the Egyptian Electricity Transmission Company (EETC), that meets EBRD's PRs and, AfDB OSs and IFC PSs , national and local requirements, as well as good international practice for the sector (e.g., for electrical transmission).	E&S risk management.	ESR1, PS1, OS1	Company, with Consultant support.	Cannot be determined at this stage	Prior to EETC's OHTL construction.	ESIA for OHTL and water supply pipeline, if applicable.	
1.3	<p>Develop and implement an ESMS for the Project (both for construction and operation) in line with the Lenders' requirements, ISO 14001 (Environmental Management) and ISO 45001 (Occupational Health and Safety) requirements. The ESMS should include as a minimum the following elements:</p> <ul style="list-style-type: none"> Reference to Scatec's E&S policy. Procedures for identifying E&S risks and impacts. Procedures and criteria for assessing the past performance of potential Engineering, Procurement and Construction (EPC) contractors with regard to employment and occupational health and safety. A procedure to include legal covenants for tenders and contracts, as well as procedures for supplier/contractor verification and auditing. Management programs to control identified E&S risks and impacts. Training matrix to cover the implementation of Environmental and Social Management Plans (ESMPs) and the Lenders' requirements, in particular labour management and subcontractor monitoring. Defined roles and responsibilities, as well as requirements to improve the organisation's competency in implementing the ESMS. Stakeholders engagement plan (SEP) and procedures for its implementation. Safeguarding/GBVH Policy. Workers' Grievance Mechanism. External Grievance Mechanism. Contractor management plan. Monitoring and reporting procedures. 	Improved E&S performance and compliance with local and lender requirements.	ESR1, PS1, OS1	Company, with Consultant support.	Management Time + Inclusion in EPC and O&M Contracts	<p>Developed Prior to construction and updated for operation.</p> <p>Implemented throughout construction and operation</p>	ESMS in place and approved by lenders (EBRD, BII, AfDB) and Company.	
1.4	<p>Develop a site specific ESMP for the Project's construction and operation phases, based on the ESIA's project ESMP, and including the following components as a minimum:</p> <ul style="list-style-type: none"> Regulatory limits. Objectives. Roles and responsibilities of management and site teams. Mitigation measures. Key performance indicators (KPIs). Relevant Monitoring parameters and frequencies of monitoring. Budgets, where applicable <p>ESMP to include the following sub-management plans as a minimum:</p> <ul style="list-style-type: none"> Resource efficiency management plan (addressing water, fuel, electricity consumption and best practice for the disposal or reuse of solar PV waste). 	E&S risk management.	ESR1, PS1, OS1	Company and EPC Contractor.	Management Time + Inclusion in EPC and O&M Contracts	<p>Prior to construction.</p> <p>Prior to operation.</p>	<p>Construction ESMP.</p> <p>Operation ESMP.</p>	

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	<ul style="list-style-type: none"> Air quality management plan. Noise management plan. Non-hazardous and hazardous waste management plan (including the establishment of a hazardous waste storage area according to Law 4/1994). Wastewater management plan. Health and safety management plan. Contractor management plan. Hazardous materials and substances management plan. Emergency preparedness and response plan, including the integration of community in the emergency preparedness and response plan. Influx management plan. Flood Management Plan. <p>Ensure the appointed EPC contractor contractually acknowledges and adopts the ESMP or develops one aligned with Company's ESMP as part of a bridging document.</p>							
1.5	<p>The Project will establish a Health, Safety and Environmental (HSE) department and Occupational Health and Safety (OHS) committee to comply with the provisions of Ministerial Decree 134/2003 when their workforce reaches 50 employees or more. The OHS committee will receive basic OHS training and meet on a monthly basis and maintain monthly meeting minutes as is required by Ministerial Decree 134/2003.</p> <p>In addition, the Project will appoint a suitably qualified labour specialist that will oversee labour compliance of the Project, third party workers and in the supply chain. The Project will also appoint a Community Liaison Officer to implement the requirements of the Stakeholder Engagement Plan.</p>	<p>Safety personnel competence and legal compliance.</p> <p>Labour specialist personnel.</p> <p>Community liaison officer.</p>	ESR1, PS1, OS1 and legal requirement.	Company.	Management Time	Prior to construction.Prior to operation.	<p>Organisational chart for construction and operation phases showing HSE, labour and stakeholder engagement roles.</p> <p>Completed training certificates.</p> <p>Training attendance register.</p>	
1.6	Contractually require the EPC contractor to appoint sufficient E&S and Human Resources (HR) staff to oversee the Project's E&S management at all times during construction in line with Egyptian E&S laws and regulations, and the Lenders' requirements.	Safety personnel competence and legal compliance.	ESR1, PS1, OS1 and legal requirement.	Company.	Included in EPC Contract	Prior to construction.	Contractor organisational chart and roles and responsibilities.	
1.7	For early works, Scatec to provide (i) a monthly E&S Report on the implementation of the E&S measures for these activities; and (ii) An E&S compliance audit report prior to the signing of the CTA to be submitted to the Lenders.	Enhanced E&S performance.	ESR1, PS1, OS1	Company.	Management Time	<p>Monthly during the construction phase.</p> <p>Annually prior to the signing of the CTA.</p>	<p>Monthly E&S monitoring report.</p> <p>Annual compliance audit report</p>	
1.8	<p>Cascade Scatec's existing supply chain management system to the Project, enabling the Project to include environmental and social selection criteria and to include processes for taking action to address environmental and social issues identified. Selection criteria to consider the past performance of suppliers, contractors, or intermediaries with regard to labour management (i.e., child labour, forced labour, etc.) and occupational safety and health; and their current capacity to implement the Lenders' requirements.</p> <p>Scatec supply chain management system will include a signed and disclosed supply chain policy and code of conduct committed to avoiding supply chain risks (forced labour, child labour, risk of material harm to workers). The system will also include i) the necessary tools and instruments to integrate supplier risk screening; ii) legal covenants for tenders and contracts requiring compliance with the Project's supply chain management system; iii) supplier verification and auditing; iv) supply chain traceability where risks are identified; and v) a clear process detailing how to engage with suppliers who are non-compliant with the code of conduct.</p>	Supply chain risk assessment	ESR1, ESR2, PS2, OS2	Company	Management Time	Prior to procurement	Scatec Supply Chain policies and procedures covering all the listed requirements	
1.9	Project EPC and O&M contractors will develop and implement their own ESMSs in line with the project ESMS and Project ESMS requirements. These ESMS will include the necessary resources, structures, policies, procedures, plans, monitoring and reporting requirements to deliver their responsibilities in line with the requirements of the project ESMS and project E&S commitments. The EPC and O&M	Enhanced E&S performance.	ESR1, PS1, OS1	EPC/O&M Contractor.	Included in EPC and O&M Contracts	<p>Prior to construction.</p> <p>Prior to operation.</p>	EPC/O&M Contractor ESMS.	

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	Contractors will ensure that the ESMS requirements extend to their contractors and subcontractors through contracting provisions, awareness raising and monitoring.							
1.10	<p>Tender documentation for the EPC contractor for the Project to include E&S and OHS requirements. These will include as a minimum:</p> <ul style="list-style-type: none"> • Complying with and explicitly referencing local environmental, health, safety and labour laws and regulations and the Lenders' requirements. • Preparation of a project specific ESMS. • Ensuring sufficient HSE and labour management personnel are present onsite. • E&S and OHS reporting requirements, including requirements for reporting of serious incidents and training of workers. • Ensuring all of the above minimum requirements apply to all subcontractors. 	E&S risk management.	ESR1, PS1, OS1	Company.	Management Time	Prior to initiating the tendering process.	Tender documentation including E&S requirements and approved by EBRD.	
1.11	Prepare environmental register and hazardous materials and waste register according to Law 4/1994.	Legal compliance.	Legal requirement	Company.	Management Time + approx. USD 3k annually for measurements by certified third party	During operation.	Environmental register. Hazardous materials and waste register.	
1.12	The Project will ensure that a Lenders' Environmental and Social Advisor (LESA) is contracted to undertake independent E&S monitoring (including a site visit) of the Project quarterly during construction and biannually during the first year of operation. The LESA will have a duty of care to the lenders and issue a report after each site visit describing the Project's E&S performance, compliance with the Lenders' requirements, the implementation of this ESAP and the compliance of the client with the environmental and social covenants in the financing agreements. LESA will also conduct an additional, stand alone detailed labour and working conditions audit at the peak of the construction. Corrective actions to be identified and agreed with Scatec if any.	E&S reporting.	ESR1, PS1, OS1	Company.	Management Time	Monthly during construction and once during the first year of operations.	E&S monitoring reports satisfactory to the Lenders.	

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	The Project will submit to monthly reports documenting the E&S measures being implemented during the construction phase to the Lenders. In addition, an annual performance audit report will be submitted to the Lenders starting the second year of the Project's implementation, compiled by the Company, summarising the annual E&S performance of the project.							

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ESR2, PS2, OS2: Labour and Working Conditions								
2.1	<p>Project to adopt and implement a Human Resources (HR) policy and procedures developed by the Project Sponsors in line with national law, the Lenders' requirements. HR policy and requirements will apply to all project contractors in line with the Lenders' requirements. Human resources policy and associated procedures and plans to include a Local Recruitment Management Plan and training strategy or similar. Implementation will be supported by the relevant contractors. The HR Policy will cover the following:</p> <ul style="list-style-type: none"> • Approach to managing the Project workforce, including third party and supply chain. • Local recruitment procedure ensuring that priority for job opportunities are targeted for local community members to the greatest extent possible throughout the construction and operation phase for skilled and unskilled jobs. • Human rights. • Working conditions and terms of employment. • Training workers on terms of employment. • Freedom of association • Child labour and forced labour. • Equal opportunities and non-discrimination. • Prevention of and adequate response to Gender-based Violence and Harrassment (GBVH). • Oversight provided of contractor policies/procedures. • Effective worker grievance mechanism including anonymous channel to report incidents. • Procedures for investigating HR incidents emphasising confidentiality, support of survivors and witnesses throughout the investigation and post-investigation and training of investigation committee members on unconscious bias and survivor support. 	Labour risk management.	ESR2, PS2, OS2	Company.	Management Time	Prior to construction. Prior to operation.	Project-specific HR policy DEIB Policy Human Rights Policy	
2.2	Commitments against child and forced labour should be included in contractors and Scatec should outline an approach to monitoring prevention of child and forced labour in the Project ESMP. For all key suppliers (panel providers, BESS and inverter) ensure that the tier 1 supplier/s is not located in an area of systemic human rights abuse	Supply chain risk management	ESR2, PS2, OS2	EPC Contractor	Management Time	Prior to procuring final product	Suitable traceability documents such as bill of material, shipping documents etc.	

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2.3	Ensure every worker engaged in the Project will receive a contract in a language that they understand that specifies various details, including (i) the nature and type of work, as well as job responsibilities, (ii) the wage and timing of payment, (iii) mandatory contributions such as medical, life, and social insurance, along with other agreed-upon benefits in both monetary and non-monetary forms, (iv) the duration of the contract, and (v) any additional necessary information. All workers must receive training on their terms of employment as part of their induction.	Labor risk management.	ESR2, PS2, OS2	Company.	Management Time	Prior to construction works commencing. Ongoing during construction and operation.	Project employment contract.	
2.4	Develop a labour management plan aligned to Scatec's HR manual which ensures that all workers are engaged in accordance with Egypt's labor laws and regulations (for leave, working hours, overtime, etc.) have unrestricted access to sanitation facilities, welfare facilities, potable water, and appropriate facilities for food preparation, storage, and eating. The labour management plan will prioritise the recruitment of local labour and commit to ensuring that wages are in compliance with Egypt's minimum wage regulations and are fair, taking into account qualifications, competencies, professional experiences, assigned roles and responsibilities, wages for similar positions, and other relevant factors. Migrant workers and women will receive equal terms of employment and working conditions.	Labour risk management.	ESR2, PS2, OS2	Company.	Management Time + Inclusion in EPC Contract	Prior to construction. Prior to operation.	Labour management plan.	
2.5	Develop accommodation requirements and develop an accommodation inspection program to ensure accommodation facilities to be provided to blue and white collar workers meet the IFC/EBRD's Workers' accommodation: processes and standards.	Labour risk management.	ESR2, PS2, OS2	Company.	Management Time + Inclusion in EPC Contract	Two months prior to construction.	Project specific ESMS (Accommodation management procedure) and contractors' Accommodation Management Plan	
2.6	Scatec to develop and implement a construction workforce demobilisation plan that specifies the requirement to train the construction workforce on the conditions of their employment, including the contract end date.	Supply chain risk management	ESR2, PS2, OS2	Scatec	Management Time + Inclusion in EPC Contract	Prior to procuring final product.	Construction workforce demobilisation plan	
2.7	Project Company develop and implement a formal internal grievance mechanism for the Project as per the Lenders' requirements, ensuring access to the grievance mechanism by all Project workers, including those employed/engaged by contractors and subcontractors.	Grievance management.	ESR2, PS2, OS2	Company	Management Time + Inclusion in EPC and O&M Contracts	Prior to construction works commencing. Ongoing during construction and operation.	Worker grievance mechanism in place. Grievance register maintained.	
2.8	Develop a security management plan in line with the Lenders' requirements.	Security risk management.	ESR2, PS2, OS2	Company.	Management Time + Inclusion in EPC and O&M Contracts	Prior to construction. Prior to operation.	Security management plan.	

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ESR3, PS3, OS3: Resource Efficiency and Pollution Prevention and Control								
3.1	Company will ensure that the EPC Contractor prepares and enforces Air Quality and Noise Management Plans for the construction phase.	Air and noise quality management.	ESR3, PS3, OS3, Local regulations. World BankEHS Guidelines	Company and EPC contractor.	Included in EPC Contract	Prior to construction.	Air quality and noise management plan.	
3.2	EPC and Operational & Maintenance (O&M) contractors to develop a waste management plan and wastewater management plan meeting the requirements of Egyptian laws and regulations and the Lenders' requirements, including requirements for management of medical and hazardous waste from the on-site clinic. The Project to confirm with the nearest Wastewater Treatment Plant (WWTP) that the facility has sufficient capacity to receive the Project's wastewater, particularly during construction.	Waste management.	ESR3, PS3, OS3, Local regulations. World BankEHS Guidelines	Company and EPC/O&M contractor.	Included in EPC and O&M Contracts	Plan in place prior to construction. Implemented during construction and operation.	Waste and wastewater management plan in place and implemented.	
3.3	EPC contractor to prepare and implement a Water Management Plan with adequate measures to minimise water use on site (e.g., reusing grey water for dust suppression activities).	Efficient water use.	ESR3, PS3, OS3	Company and EPC contractor.	Included in EPC Contract	Plan in place prior to construction. Implemented during construction.	Water Management Plan in place and implemented.	
3.4	Implement the following hazardous material storage good practices: <ul style="list-style-type: none"> • Install controls to disable access of unauthorized persons. • Install impermeable flooring and appropriate drainage pits and sump pits to collect any spilled liquids. • Use spill containment pallets or other appropriate secondary containment methods. • Drums to be clearly labeled with information about their contents, including the type of oil, hazards associated with the material, and any other relevant information. • Display handling instructions and safety signage. • Install emergency response equipment, such as fire fighting extinguishers (type depending on material stored), absorbents and other spill. 	Hazardous material management.	ESR3, PS3, OS3 and legal requirement	Company and EPC contractor.	Included in EPC Contract	During construction and operation.	Permanently established hazardous material storage area meeting Egyptian regulatory requirements and international good practice.	

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ESR4, PS4, OS4: Health, Safety and Security								
4.1	Company to ensure that the Engineering, Procurement and Construction (EPC) and Operational & Maintenance (O&M) Contractors develop an Occupational Health and Safety Plan (OHSMP) during the construction and operation phases, addressing key impacts such as extreme heat and heat stress, electrocution, working at height, lifting, etc. and including OHS training requirements, OHS lead and lagging indicators, a commitment to implementing a permit to work system, incident investigation and reporting procedure, conducting OHS risk assessments.	Worker health and safety.	ESR4, PS2, OS2, OS4 and legal requirement	Company, EPC and O&M contractor.	Management Time + Inclusion in EPC and O&M Contracts	Prior to construction. Prior to operation.	OHSMP.	
4.2	Establish a clinic on-site with the presence of a nurse and physician. Adequate arrangements must be made to have an ambulance available at the site as well. The clinic should be equipped with essential medical equipment, including an Automated External Defibrillator (AED), stretchers, backboards, immobilization equipment, a sphygmomanometer, an oxygen tank, a refrigerator, and any other necessary medical equipment. Additionally, the clinic should be stocked with antivenom to address snake bites.	Worker health and safety.	ESR4, PS2, OS2, OS4 and legal requirement	Company, EPC and O&M contractor.	Included in EPC Contract	Prior to construction. Prior to operation.	Clinic established onsite.	
4.3	Develop and implement a workers' Influx Management Plan (IMP).	Community health and safety.	ESR4, PS2, OS2, OS4 and legal requirement	Company, EPC and O&M contractors.	Management Time + Inclusion in EPC Contract	Prior to construction.	Worker IMP.	
4.4	EPC and O&M Contractors to develop and implement a comprehensive Traffic and Road Safety Management Plan in compliance with Egyptian Traffic Rules and Regulations for the transport of Project materials and workers. This plan should include a systematic vehicle inspection and maintenance program, establishment of transportation-related Key Performance Indicators (KPIs), a tracking system for traffic violations to identify areas for improvement, and a journey management plan that covers all aspects of road transport safety. The plan should also consider potential impacts associated with the OHTL.	Community health and safety.	ESR4, PS2, OS2, OS4 and legal requirement	Company, EPC and O&M contractors.	Management Time + Inclusion in EPC and O&M Contracts	Prior to construction Prior to operation.	Traffic and road safety management plan.	

4.5	<p>Develop a Project-specific emergency preparedness and response plan which may include the following elements:</p> <ul style="list-style-type: none"> • Determination of potential emergency scenarios (including flooding, extreme heat and earthquakes). • Training requirements for specialized emergency response teams. • Maintenance of a list of emergency contacts and the implementation of communication systems and protocols. • Guidelines for interfacing with government authorities, including emergency, health, and environmental agencies. • Maps showing locations of of emergency equipment and facilities, such as first aid stations, automated external defibrillator, firefighting gear, spill response tools, and personal protective equipment for the emergency response teams. • Standard procedures for utilizing the emergency equipment and facilities. • Clear marking of evacuation routes and designated assembly points at consumable and spare part warehouses. • Scheduled emergency drills, with frequency based on assigned emergency levels or tiers. • Protocols for decontamination and immediate actions to mitigate, limit, and reduce pollution within the Project's physical boundaries and assets whenever feasible. • Integrate community in the emergency preparedness and response plan. • Incident reporting in line with Lender requirements and as prescribed in the loan agreement. 	Emergency response.	ESR4, PS2, OS2, OS4 and legal requirement	Company, with Consultant support.	Management Time + Inclusion in EPC and O&M Contracts	Prior to construction. Prior to operation.	Project-specific emergency preparedness and response plan.	
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ESR6, PS6, OS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources								
6.1	The ESMP to be updated to include i) additional mitigation measures devised in the ESIA addendum addressing potential risks of bird collision and electrocution from overhead transmission lines and ensuring the ESMP includes measures meeting the requirements of IFC's Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution, where relevant, practical and feasible; and ii) an Alien Plant Management Plan.	Biodiversity Risk Management	ESR6, PS6, OS6	Company and biodiversity contractors	Management Time + Inclusion in EPC Contract	Four months prior to start of construction	Updated ESMP.	
6.2	Develop a Biodiversity Management Plan (BMP) to train and inform workers on actions in case they encounter PBFs. The BMP would provide a strategy for implementing the mitigation hierarchy in such a way that no net loss can be achieved.	Biodiversity Risk Management	ESR6, PS6, OS6	Company and biodiversity contractors	Management Time + Inclusion in EPC Contract	Within one month of official Project disclosure and prior to commencing and/or advancing construction of the solar and BESS	Biodiversity Management Plan submitted for lender approval	

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ESR8, PS8, OS8: Cultural Heritage								
8.1	Engineering, Procurement and Construction (EPC) Contractor to develop chance find procedures as part of the site construction management plan.	Managing potential chance finds.	ESR8, PS8, OS8	Company and EPC Contractor.	Management Time + Inclusion in EPC Contract	Procedure in place prior to earth works. Procedure implemented during earth works.	Chance Find procedure in place and implemented.	

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ESR10, PS1, OS10: Information Disclosure and Stakeholder Engagement								
10.1	Implement the Project Stakeholder Engagement Plan (SEP) developed for the Project. The SEP will include a public grievance mechanism which company will be responsible for implementing.	Stakeholder engagement and information disclosure.	ESR10, PS1, OS10	Company	Management Time + Inclusion in EPC Contract	During all project phases.	Supporting documentation (e.g., stakeholder meeting logs, minutes of meeting, etc.) demonstrating implementation of the SEP and public grievance mechanism implemented and records maintained.	
10.2	Develop and implement a Gender-Based Violence and Sexual Assault and Harassment grievance mechanism that has a survivor based-focus for dealing with GBV and SEAH related grievances linked to the Project as defined in the Project SEP	GBV/SEAH grievance mechanism.	ESR10, PS1, OS10	Company	Management Time + Inclusion in EPC Contract	During all project phases.	Worker Grievance Mechanism Community Grievance Mechanism	
10.3	Develop and implement a Corporate Social Responsibility (CSR) plan, with target initiatives, allocated budget, implementation schedule and appropriate resources. The CSR plan will be informed by engagement with key stakeholders, including local communities (including marginalised and vulnerable groups) as well as local and regional authorities. The CSR plan must adopt a gender-based lens to ensure that initiatives are gender-representative and aimed at empowering women in a culturally-sensitive approach.	Corporate social responsibility	Best practice	Company	Management Time	Prior to operation	CSR plan	