

**Annex 3: Template for Environmental and Social Management Plan (ESMP) as annexed to the  
Financing Agreement**

**[Project Obelisk SAE & SAP Code]**

**Environmental & Social  
Management Plan (ESMP)**

## General considerations

1. [Scatec ASA] is planning to implement the [Obelisk] Project (the **Project**). The Bank has agreed to provide financing, implementation support and monitoring for the Project.
2. [Scatec ASA] will implement measures and actions of this Environmental and Social Management Plan<sup>63</sup> (**ESMP**) so that the Project meets all the requirements of the Bank Environmental and Social Operational Safeguards (**OS**) and the National policy and legal requirements.
3. Where the ESMP refers to specific plans, whether they have already been prepared or are to be developed, the ESMP requires compliance with all mandatory provisions of such plans.
4. The table below summarizes the material measures and actions that are required, the basis of the requirement, the timing of the measure or action, and the criteria to be used for determining whether the required measure or action has been successfully achieved. [Scatec ASA] is responsible for compliance with all requirements of the ESMP even when implementation of specific measures and actions is conducted by an entity different from the Project Implementation Unit (PIU).
5. Implementation of the material measures and actions set out in this ESMP will be monitored and reported to the Bank by [Scatec ASA] as required by the ESMP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the measures and actions throughout implementation of the Project.
6. As agreed by the Bank and [Scatec ASA], this ESMP may be revised from time to time during Project implementation, to reflect adaptive risk management of project changes and unforeseen circumstances or in response to assessment of project performance conducted under the ESMP itself. In such circumstances, [Scatec ASA] will propose and agree changes with the Bank, and then update the ESMP to reflect such changes.

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<sup>63</sup> The ESMP refers to all the E&S risks/impacts and measures, as approved in all the disclosed E&S documents and agreed between the Bank and Borrower. For projects involving multiple subprojects, that are identified, prepared and implemented during the course of the project, the Borrower will need to demonstrate to the Bank, before the project appraisal, through the preparation of E&S documentation of a sample of subprojects, that it has the capacity to carry out appropriate environmental and social assessment of subprojects, and prepare and implement such subprojects in accordance with the national laws and the OSs. (*Section III.2.3 of Bank's ESP and section D of OSI*)

<b>Material Actions<sup>64</sup> to Manage the Project's E&amp;S Risks and Impacts</b>		<b>Basis for Requirement</b>	<b>Key Performance Indicator</b>	<b>Indicative Timing/Deadline</b>
Periodic E&S implementation report to the Bank		Bank's ESP and OS1	Reports submitted in time, in good standard	Monthly E&S measures implementation reports. Five (05) days after the due period. Annual E&S performance audit no later than the end of the first quarter of the following year
1	Recruitment of E and S specialists as part of the Project implementation unit	Disclosed ESIA, OS1	E&S Team of 3 resources permanent in place	Available throughout project construction and operation phases
2	Establishment of the Project Grievance Redress Mechanism (GRM) and disclosure to Public	OS1, OS10 and National requirements	A grievance redress mechanism dedicated for the Obelisk project	Available starting by April 2025 and throughout project construction and operation
3	Payment of compensation and reinstallation of affected people	OS 5	Not applicable	Not applicable
4	Incorporation of site-specific E&S measures in the request for proposals	OS1 & national requirements	Not applicable	Not applicable
5	Submission of high-risk activity's Contractor ESMP (C-ESMP) to Bank clearance	Bank's ESP and OS1	Submission of C-ESMP to Bank for review and clearance	Three weeks prior to commencement of construction phase
6	Establishment of the Contractor's Grievance Mechanism (GM) and information of workers	OS1, OS2 et Bank's Disclosure and Access to Information Policy	The grievance mechanism of the contractor is developed, in place, and workers are informed.	Three weeks prior to commencement of construction phase
7	Obtaining nationally required licenses prior commencement of subjected activities (excavations, tree-cutting, working at height, working in confined spaces, etc.)	OS1, OS2 and national labor laws	All nationally required licenses of subjected activities are obtained	Before starting works, before starting any activity requiring national licenses and prior operational phase
8	Preparation, approval, and disclosure of specific E&S documents during Project implementation, including prior review of Category 1 terms of reference by the Bank	Bank's ESP, OS1 and national requirements	E&S documents prepared, approved and disclosed as applicable	When applicable
9	Engagement with concerned stakeholders of each relevant specific E&S activity	OS1, OS10, Bank's Disclosure and Access to Information Policy	Evidence that the stakeholder engagement has taken place	Throughout the preparation, construction and operational phases
10	Establishment of Emergency Preparedness and Response mechanism	OS1 & OS4, national legislation on contingencies et civil protection	Emergency preparedness and response plan is developed	Three weeks prior to commencement of construction phase
11	Appropriate and timely handling of complaints/grievances	Bank's ESP and OS1	Complaints and grievances addressed appropriately and in a timely manner	Throughout the construction and operational phases
12	Notification to riparian or alert to downstream exposed peoples	Bank's ESP and OS1, applicable International Treaty/Convention ratified	Not Applicable	Not Applicable
13	Capacity building of key project implementers	OS 1	Existing Capacity building plan	Throughout the construction and operational phases

14	Implementation of ESMS/ESAP <sup>65</sup>	OS1 and OS9, national requirements	Existing ESMS procedures and ESAP implemented, monitored and audited by external entities.	Throughout the construction and operation phases
14.1	<i>Approval of any required E&amp;S management procedure</i>	Ditto	Submission of ESMS	Three weeks prior to commencement of construction phase
14.2	<i>Establishment of the E&amp;S unit</i>	Ditto	E&S unit in place	In place throughout the construction and operation phases
14.3	<i>Capacity Building of the E&amp;S Unit</i>	Ditto	Existing Capacity building plan and evidence of its implementation submitted	Throughout the construction and operation phases Evidence provided in the periodic E&S reports
14.4	<i>Processing the Value Chain E&amp;S due diligence</i>	Ditto	ESDD report with a summary of the assessment of risks and opportunities with the supplier, identifying impacts, mitigating risks, and ensuring compliance for long-term sustainability	When required
15	Suspending works in the event of EOHS risk or incident, immediately notify the Bank, and resume works only upon no-objection of the Bank.	Bank's ESP	Bank notified of the incident	Immediately, no later than 72 hours after the occurrence

<sup>64</sup> Please add any key relevant action and/or indicate 'Not applicable' in the third column ('Basis for requirement') for those actions that are not applicable to the project.

<sup>65</sup> Apply to Non-sovereign operations and public sector project implemented by permanent/autonomous Agency/Institution.

16	Prepare the root-cause analysis (RCA) of any fatal EOHS incident and implement the Corrective Action Plan (CAP).	Bank's ESP and OS1	RCA prepared and CAP implemented	whenever required
17	Disclosure of Project's E&S reports to the public	OS1, OS10, Bank's Disclosure and Access to Information Policy	Annual ESG, TCFD reports, and Sustainability Annual Reports disclosed to the public	Available at the end of the first quarter of the year