

ESAP #	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD ESR, AfDB OS, Best Practices)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
ESR 1/OS 1/PS 1						
1.1	The associated 500 kV Overhead Transmission Line (OHTL) connecting S4 Gharb Bakr Substation to Shadwan Substation will be include as part of the project ESIA (an annex) and aligned with lender E&S standards and the appropriate assessment and mitigation of risks and impacts. The ESIA will include a formalised, participatory disclosure and consultation process in line with lender standards and regulatory requirements. Project will prepare the ESIA on behalf of EETC and will follow up with EETC to acquire approval from the Egyptian Environmental Affairs Agency (EEAA). Project will also ensure that BFDs are procured and will follow up with EETC (owner) for installation.	E&S assessment of risks and impacts	ESR1, OS1, PS1 ESR2, OS2, PS2 ESR3, OS3, PS3 ESR4, OS4, PS4	Company	Project ESIA completed and disclosed. OHTL ESIA prepared and evidence of following up with EETC to acquire the approval and implement the mitigation measures by EETC	OHTL ESIA study and evidence of follow up with EETC to acquire EEAA approval and to implement mitigation measures

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1.2	Maintain a permits register and obtain, maintain and comply with all permits, licences authorisations and approvals for the construction, operation and decommissioning of the Project, including temporary construction facilities, access roads and associated infrastructure, prior to the activities for which they are required. The permits register will identify permit requirements, issuing authorities, status, validity periods, permit conditions and compliance obligations. The Project will verify and document that any authorised construction activities undertaken prior to Full Notice to Proceed (NTP), including temporary facilities and access roads where applicable, are supported by the permits, approvals and authorisations required under Egyptian law. Permits, licences and approvals shall include, as applicable:: • Egyptian Environmental Affairs Agency (EEAA) approval; • EEAA approval for the OHTL (follow up with EETC will be maintained) and substation; • Permit for onsite accommodation by NREA and the Armed Forces • Building Permit; • Radio frequency approval; • Approval for emergency response and firefighting plans; • Primary Site Access Route equipment transportation permit and heavy equipment transportation (coordination and notification of relevant authorities is required); • Construction and Operation Permit for Private Investors – Temporary Permit - to allow construction of Project; and • Construction and Operation Permit for Private Investors Generation Licence – to carry out production, distribution or sale of electricity.	Legal compliance	ESR1, OS1, PS1 National permitting requirements National permitting requirements	Company/EPC Contractor	Permits register maintained throughout the Project lifecycle. Permits, licences and approvals obtained sufficiently in advance of the relevant activity to allow LESA and lender review, where applicable. Verification of permits and approvals applicable to any authorised early works activities completed prior financial close.	Comprehensive permits and approvals register established and maintained. Required permits, licences and approvals obtained and valid prior to commencement of the activities for which they are required. Evidence provided that authorised early works activities are supported by the permits and approvals required under Egyptian law. Permit conditions tracked and implemented through the Project ESMS.
1.3	Ensure that the conditions of the Environmental Permit issued by the EEAA on 28 January 2026, are implemented in full.	Legal compliance.	ESR1, OS1, PS1 National permitting requirements.	Company.	As per timeline stipulated in the Environmental Permit.	Discharge of permit conditions by the EEAA. LESA monitoring reports to lenders to include updates on

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						the implementation of EEAA conditions
1.4	The Project will develop, implement and maintain a comprehensive Environmental and Social Management System (ESMS) aligned with the requirements of EBRD ESR1, AfDB OS1 and IFC PS1, good international practice and local E&S regulations, and commensurate with the E&S risks and impacts of the Project. The Project ESMS will describe how Scatec's existing corporate Environmental and Social Policy and management system requirements are applied at the Project level. This system will allow for the identification, evaluation, and mitigation of environmental and social risks of projects, as well as comply with regulatory requirements and lender environmental and social standards. The ESMS manuals for the Project are to be further developed and finalised prior to the end of the disclosure period. The ESMS will provide for the identification, assessment, management, monitoring and mitigation of E&S risks and impacts throughout the Project lifecycle. Where authorised construction, early works or mobilisation activities have commenced, the Project will assess the adequacy of the E&S management arrangements currently being implemented and identify any actions required to achieve alignment with the Project ESMS and lender requirements. The Project construction-phase ESMS manuals will be finalised prior to the end of the disclosure period and maintained throughout construction and operation. Operation phase ESMS will be finalized prior to operation phase. As part of the Project ESMS, Construction-ESMPs and Operation-ESMPs, including sub-management plans, will be developed, implemented and cascaded by the Company to the Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractors following their review and clearance by the LESA.	E&S risk and impact management	ESR1, OS1, PS1	Company, Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractors	Project construction phase ESMS finalised prior to end of the disclosure period O&M phase ESMS completed before operation. ESMS is maintained throughout construction and operation. Assessment report by Scatec on the project's E&S management arrangements for any authorised construction works activities undergoing completed and any required corrective actions implemented prior to the end of the disclosure period. Appropriate E&S management arrangements to be implemented prior to end of the disclosure period	Project-specific ESMS finalised, approved and implemented, demonstrating alignment with Scatec's corporate E&S Policy and management system requirements, including Construction and Operational ESMPs and associated management plans. Assessment of E&S management arrangements for any authorised construction, early works completed and any identified corrective actions implemented. Evidence that Project ESMS requirements have been communicated and cascaded to EPCM, HV, BoP and O&M contractors.

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	Appropriate E&S management procedures and controls will be in place for any authorised construction activities prior to commencement of those activities.					
1.5	The Project will review the findings and recommendations of the Climate Change Physical Risk Assessment (CCRA) and demonstrate how the identified climate adaptation and resilience measures have been incorporated, as applicable, into the Project ESMS, ESMPs, OHS procedures, emergency preparedness and response arrangements, operational management plans and relevant design documentation.	Climate change resilience; worker health and safety; flood risk management; operational resilience	ESR1, OS1, PS1; ESR3, OS3, PS3; ESR4, OS4, PS4	Company, EPC Contractor and O&M Contractor	Prior to end of the disclosure period and prior to operation, as applicable	Climate adaptation/resilience memorandum or Action Plan prepared. Relevant ESMS/ESMP/OHS/ documents updated
1.6	The Project will establish an HSE department and 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.	E&S risk and impact management.	ESR1, OS1, PS1 Ministerial Decree 134/2003.	Company Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractors (if employees exceed 50 or more in the operational phase).	Prior to workforce reaching 50 employees or more for each contractor.	Project HSE departments and OHS committees in place (evidenced by minutes of inaugural meeting) to comply with the provisions of Ministerial Decree 134/2003 when their workforce reaches 50 employees or more.
1.7	Project Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractors will finalize and maintain their own ESMSs aligned with the Project ESMS and Project E&S requirements. These ESMS will include the necessary resources, organizational structures, policies, procedures, plans, monitoring and reporting requirements necessary to deliver their responsibilities in line with the requirements of the project ESMS and Project E&S commitments. For contractors undertaking authorised construction works or already mobilised to site, the Project shall assess the adequacy of the E&S management systems and procedures currently in place and identify any	E&S risk and impact management	ESR1, OS1, PS1	Company, Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractors	Prior to disclosure for contractors already on site carrying out early works. Prior to operation for the O&M contractor	Assessment of E&S management systems currently implemented by mobilised contractors completed, including identification of gaps and corrective actions, where required. Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and

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	corrective actions required to achieve alignment with Project, lender and applicable regulatory requirements. The Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractors will ensure that the ESMS requirements extend to their contractors and subcontractors through contractual provisions, awareness raising, supervision and monitoring.					O&M contractors ESMSs in place appropriate to nature, scale and risk profile of the Project. Evidence that ESMS requirements have been communicated and cascaded to contractors and subcontractors through contractual provisions and management processes. Monitoring, inspections and audits demonstrate effective implementation of contractor ESMS requirements and closure of identified corrective actions.
1.8	The Project ESMS will be supported by suitably qualified and experienced staff and resources as detailed in the finalised ESMS manuals. The Project will assign and maintain, at a minimum, a Project HSE Manager, E&S Manager, a Community Liaison Officer (CLO), and an Labor Compliance Officer (familiar with internationally funded projects and issues around managing of subcontractors and casual labour), who will be supported,, as needed, by specialist consultants. In addition, a Biodiversity resource will be hired by Scatec for biodiversity management to ensure the implementation of the BMP and BAP during the construction and operational phase. Contractually require the Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractorsto appoint and maintain suitably qualified and experienced Environmental, Social, Health and Safety (ESHS) personnel, including dedicated Health and Safety Managers/Officers, HR staff and labour/welfare officers, in numbers commensurate with the scale of the activities and workforce size.	E&S risk and impact management	ESR1, OS1, PS1	Company, Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractors	Prior to end of the disclosure period and maintained throughout construction and operation.	Project and contractor ESHS, community liaison, HR and labour/welfare personnel appointed and maintained throughout the relevant Project phase, evidenced through organisational charts, role descriptions, CVs and employment contracts or abstracts of contracts.. Current and planned Project and contractor ESHS organisational structures, including mobilisation schedules, available for lender review. Contractor ESHS staffing levels demonstrate resources

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	The EPCM contractor's team shall include a suitably qualified resources throughout the construction phase of the Project and will commit to implementing the BMP and following clearance instructions from RCREEE/Safe Soar. The Project shall require the High Voltage (HV), Balance of Plant (BoP) and O&M contractors to appoint sufficient counterparts to Project E&S roles, including appropriate Health & Safety Officers, community liaison, HR staff and labour/welfare officers to ensure effective implementation of Project ESHS requirements and satisfactory oversight of the entire construction workforce, and compliance with applicable Egyptian legal requirements regarding occupational health, safety and worker welfare..					commensurate with workforce size, Project activities and risk profile. Contractual arrangements with RCREEE to provide Biodiversity Management services.
1.9	Project to adopt and implement Scatec's existing supply chain and contractor management systems, including human rights due diligence requirements, 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., including human rights risks, child labour, forced labour, discrimination, harassment, etc.) and occupational safety and health; and their current capacity to implement the requirements of EBRD's ESR2 and ESR4, IFC's PS2 and AfDB OS2 and OS4. Process documentation will include a position statement on avoiding supply chain risks (forced labour, child labour, risk of material harm to workers) and requirements for supplier risk screening, legal covenants for tenders and contracts, supplier verification and auditing, and supply chain traceability where risks are identified. Where suppliers, contractors or subcontractors have already been selected or appointed prior to implementation of this action, the Project shall follow up with Envision on the recommendation of the Labour audits carried out in assembly facilities.	Supply chain risk assessment	ESR1, ESR2 OS1, OS2 PS1, PS2	Company	For suppliers, contractors and subcontractors already appointed, any required corrective actions implemented in accordance with an agreed timeframe.	Formal supplier and contractor selection process (a supply chain management system) in place at the Project level. Monitoring of labour audit recommendation implementation in the AESRs.

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1.10	Contract documentation for the Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractors to include environmental, health, safety and social requirements. These will include, as a minimum: • Complying with all applicable conditions listed in the EEAA's environmental permit and ESIA's; • Complying with and explicitly referencing local environmental, health, safety and labour laws and regulations and EBRD/AFDB/IFC E&S standards; • Supply chain requirements (as per the financing documents); • Complying with Project's ESMS; • Preparation of a project specific ESMS; • Ensuring sufficient HSE and labour management personnel are present onsite; • Environmental, health, safety and social reporting requirements; • Right of site access of Project, the lenders and their advisors; • Ensuring all of the above minimum requirements apply to all subcontractors; • Presenting a detailed E&S budget required to implement each of the items listed above. For contracts already awarded or under implementation, the Project shall assess the extent to which the above requirements have been incorporated and identify any gaps or corrective actions required to achieve alignment with Project and lender requirements. Where gaps are identified, the Project will implement appropriate measures, including contractual amendments, supplementary agreements, management plans or other mechanisms, to address the identified deficiencies.	E&S risk and impact management	ESR1, OS1, PS1	Company	Assessment of existing contracts prior to end of the disclosure period, with gap closure implemented prior to commencement of the relevant activities. Ongoing for future contracts and subcontractors.	Tender and contract documentation includes environmental, health, safety and social, including supply chain requirements - evidenced by relevant and validated clauses in documentation. Any material contractual gaps identified and corrective measures implemented.
1.11	Develop, implement and maintain a Project-specific Contractor Management Plan that guides monitoring for ongoing compliance with E&S requirements. Where contractors have already mobilised or commenced authorised construction, the Project will assess existing contractor management arrangements and identify any corrective actions required to achieve alignment with Project and lender requirements.	Supply chain risk assessment	ESR1, ESR2 OS1, OS2 PS1, PS2	Company	Prior to end of disclosure period and maintained throughout construction and operation. Existing arrangements for mobilised contractors to be assessed and, where necessary, updated.	Contractor Management Plan

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1.12	Project Sponsor will contractually require the wind turbine supplier to commit to implementing a robust supplier management and traceability system for their pre-screened suppliers to avoid labour risks in the wind turbine supply chain. The wind turbine supplier will be required to report to the Project on implementation of its supply chain (SC) commitments on a semi-annual basis using an agreed reporting template with relevant supporting materials. If required, The Project can request the 3rd party on-site verification of the selected facilities of wind turbine vendor's suppliers to confirm that the wind turbine components were sourced from the ring-fenced suppliers. Where the wind turbine supplier has already been selected or contracted, the Project will review the applicable supply and O&M agreements and associated supplier management arrangements to verify that equivalent supply chain management, traceability, labour rights and human rights due diligence requirements have been incorporated. Where gaps are identified, the Project will implement appropriate corrective measures, which may include contractual amendments, supplementary commitments, supplier engagement, monitoring or verification activities, commensurate with the identified risks.	Supply chain management	ESR2, OS2, PS2 Good International Practices ILO labour standards	Company	For any wind turbine supplier not yet contracted, prior to contract award and agreed in principle prior to lender decision-making. For wind turbine suppliers already selected or contracted, contract review and gap assessment completed prior to end of the disclosure period, with any identified corrective actions implemented in accordance with an agreed timeframe. ▪ Semi-annual reporting on supply chain commitments status after the components have been produced/assembled	Appropriate requirements in wind turbine supply and O&M services contractor contracts to avoid labour issues and risks. Semi-annual monitoring report on SC commitments On-site verification report of the wind turbine vendor's selected supplier's facilities. Contract review and gap assessment completed for any existing wind turbine supplier agreements, with identified corrective actions tracked and implemented. Semi-annual monitoring reports on supply chain commitments submitted to the Project.

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1.13	The Project will submit to the Lenders and to the LESA a monthly environmental and social report describing compliance with the lenders environmental and social standards, the implementation of this ESAP and the Project's E&S performance. The LESA will undertake periodic E&S monitoring of the Project, including site visits, to assess compliance with lender requirements, implementation of the ESAP and overall E&S performance. Thereafter, the Project will submit to the Lenders an annual report, compiled by the Company, summarizing the annual E&S performance of the project.	E&S reporting	ESR1, OS1, PS1	Company	Monthly E&S reporting by the Company during life of the Project. LESA E&S monitoring undertaken quarterly during construction. LESA E&S monitoring undertaken bi-annually during the first year of operations. annual E&S performance audit prepared by n independent consultant (engaged by the Company)during construction and the first two (2) years of operations. Annual E&S performance report by the Company from the third year of operations onwards.	E&S monitoring reports by Project and LESA satisfactory to the Lenders. E&S compliance, ESAP implementation and Project E&S performance satisfactory to the Lenders.
1.14	Prepare environmental register, hazardous waste and substances register for the Project according to Law 4/1994. Ensure the environmental register contains updated information on air quality, noise, light intensity, heat stress, waste management and emergency response planning.	E&S reporting	Law 4/1994	Company	During construction and operation	Environmental register completed in compliance with Law 4/1994

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1.15	The Project will prepare a Decommissioning and Site Restoration Plan in accordance with applicable national requirements, EBRD ESRs, AfDB OSs and IFC PSs. The Plan shall address the removal or repurposing of turbines, substations buried cables, buildings and ancillary infrastructure; management of decommissioning wastes; rehabilitation and restoration of temporarily and permanently disturbed areas; biodiversity restoration requirements; stakeholder engagement; and post-closure monitoring requirements. The Plan shall be reviewed and updated periodically throughout the Project life and finalised prior to commencement of decommissioning activities.	Decommissioning and site restoration risk management	ESR1, OS1, PS1 Good International Industry Practice (GIIP)	Company	Detailed Plan at least five (5) years prior to decommissioning	Decommissioning and Site Restoration Plan developed and implemented. Periodic review and update of the Plan. Site restoration completed in accordance with lender and regulatory requirements.
ESR 2/OS 2/PS 2						

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2.1	Project to adopt and implement Scatec's HR Policy in line with national law, the EBRD ESR2, the AfDB OS2 and the IFC PS2. HR policy and requirements will apply to all project contractors in line with lender requirements. The HR policy and associated procedures and plans will include, as a minimum, a Labour and Working Conditions Management Plan, Employment and Procurement Management Plan, including provisions for local recruitment, training and workforce development. Implementation will be supported by the relevant contractors. The HR Policy should at least cover the following: • Approach to managing the Project workforce. • 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. • Child labour and forced labour. • Equal opportunities and non-discrimination. • Prevention of and adequate response to Gender-Based Violence (GBV) and Sexual Exploitation, Assault and Harassment (SEAH). • Oversight provided of contractor policies/procedures. • Effective worker grievance mechanism. Ensure that the labour requirements are cascaded to contractors. Worker grievance mechanism to be developed in line with lender requirements and available to all workers including contractor workers where required. Consideration to be given to the handling of sensitive grievances.	Worker risk management	ESR2, OS2, PS2	Company, Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractors	Prior to end of the disclosure period and maintained throughout construction and operation. Existing arrangements for any mobilised workforce to be assessed and updated as necessary.	HR policies, procedures and plans satisfactory to lenders Labour and Working Conditions Management Plan and Employment and Procurement Management Plan developed and implemented. Training strategy and training matrix developed and implemented. Grievance mechanism available to all workers including sub-contractors. Cascade of HR requirements to contractors. Documented information on the policies and procedures provided to onboarded workers, including clearly communicating their rights – evidenced within an onboarding procedure.

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2.2	Ensure that labour and working conditions compliance monitoring is undertaken during construction and which is to include the following: • Bi Annual labour,working condition and H&S audits conducted internally inspecting aspects including labour contracts, safety inspections, records of incidents, grievance records etc. to ensure compliance with national law and international standards. The first labour audit needs to be completed as soon as workforce starts mobilizing to the project site. • Weekly monitoring of workers employed by contractors and subcontractors through random spot checks of workers contracts, payroll, overtime, awareness, and use of project grievance mechanism; through interviews and review of workers files; • Weekly review of worker grievance logs (including contractors and subcontractors on site); • Weekly review of training records; and • Monthly reporting on compliance against project HR policies and procedures • Regular training to workers on key HR procedures, including grievance mechanism, GBVH procedures, working conditions (minimum wage, working hours, over time requirement) and health and safety. Migrant workers will need to be identified to ensure that their conditions of employment are equivalent to that of non-migrant workers. Ensure that the ESR2/OS2/PS2 labour requirements are incorporated into contractor and subcontractor management arrangements and are cascaded through all tiers of the Project workforce. Contractors will be required to ensure equivalent compliance by their subcontractors and provide access to personnel, records and facilities to enable the Project to carry out labour audits and inspections as/when required and to perform regular enhanced reporting on labour compliance with ESR2/OS2/PS2.	Worker risk management	ESR2, OS2, PS2	Company, Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractors	First internal inspection to be undertaken before the end of the disclosure period and During construction	Weekly inspection records Monthly reports Identification of migrant workers. Copy of contractor worker training material and training calendar Bi-annual internal labour and working conditions audits in compliance with Egyptian law and PS2/ESR2. Scope of audits to include review of risks related to migrant workers.

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2.3	Ensure that the site has basic services for the workforce, including seasonal bird observers, such as security arrangements; appropriate work temperature; safe food; drinking water; access to safe exit in emergency conditions; segregated toilets, washing facilities and sleeping areas for women and men; and access to means of communication with areas outside the project boundary. Consider needs in relation to migrant workers (including different cultural needs) and women.	Worker risk management	ESR2, OS2, PS2	Company	During construction and ongoing during implementation	Inspection program and register. Weekly inspection and records. Monthly reporting procedures established by EPCM.
2.4	Assess workforce accommodation requirements for the project using insights from the city council, accommodation providers and ongoing wind projects. The assessment will include Siemen's/Arcon's onsite accommodation requirements to identify the anticipated workforce numbers and composition requiring accommodation, and evaluate the environmental and social risks and impacts associated with the proposed accommodation arrangements. The assessment will consider, as applicable, potential impacts associated with worker influx, pressure on housing availability and affordability, demand on public infrastructure and services, community health and safety, traffic and transport, security, community-worker interactions, gender-based violence and harassment risks, cultural sensitivities, cumulative impacts, and other relevant social and environmental considerations. Appropriate mitigation and management measures will be identified and incorporated into Project management plans. Based on the outcomes of the assessment, develop and implement a Worker Accommodation Management Plan to ensure accommodation facilities to be provided to blue- and white-collar workers meet the IFC/EBRD's Workers' accommodation: processes and standards to the extent feasible. The Plan will define minimum standards for location, design, occupancy levels, privacy, ventilation, lighting, fire safety, food safety, emergency preparedness, sanitation, potable water supply, wastewater and solid waste management, housekeeping, security, recreation facilities, worker welfare, grievance mechanisms and access to medical services. Where offsite accommodation is utilized, the plan should establish measures to avoid or minimize adverse impacts on location communities, including housing market pressures rent inflation, increased demand on local services and infrastructure, and community health and safety risks. The plan should be	Worker risk management	ESR2, OS2, PS2	Company, EPCM	Prior to construction of the workers' camp onsite. Prior to occupation of any worker accommodation facilities offsite associated with the Project, or within one (1) month of Financial Close for any accommodation facilities already in use that were specifically rented for the purpose of the project. Ongoing throughout construction.	Worker Accommodation Assessment completed, including identification and assessment of environmental and social risks and impacts associated with the selected accommodation strategy. Worker Accommodation Management Plan(s) developed and implemented, satisfactory to lenders. Regular internal monitoring and audits of worker accommodation, with corrective actions tracked to closure.

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	cascaded to contractors providing their workforce with accommodation for this project. The inspection program of accommodation units should establish inspection frequency, roles and responsibilities, compliance checklists, corrective action tracking, and reporting mechanisms to verify ongoing compliance and timely remediation of identified gaps.					
ESR 3/OS 3/PS 3						
3.1	Finalize and implement an Air Quality Management Plan and a Noise Management Plan that includes procedures to mitigate air and noise emissions during operation, and contractors to develop and implement those plans in construction in accordance with the Project's construction ESMS. The plans should comply with regulations, involve the relevant internal and external roles with their responsibilities, and be integrated into the overall E&S management system for effective and consistent management throughout the company and its subsidiaries.	Worker health and safety	ESR3, OS3, PS3	Company, Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractors	Air Quality Management Plan and Noise Management in place prior to each contractor's construction activity	Air Quality and Noise Management Plans in place and implemented
3.2	Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractors to finalize a waste management plan and wastewater management plan meeting the requirements of Egyptian laws and regulations and EBRD's ESR3, AfDB's OS3 and IFC PS3. Ensure the Wastewater Management Plan includes measures for prevention of contamination of the environment from batching plant wastewater, should the Project establish an on-site plant during construction. Measures for appropriate disposal of contaminated equipment wash water should also be included. The Project to confirm with the Ras Ghareb WWTP that the facility has sufficient capacity to receive the Project's wastewater, particularly during construction. Where wastewater is stored onsite, including at worker accommodation facilities or construction camps, the Project will ensure that wastewater storage facilities are	Waste management	ESR3, OS3, PS3	Company, Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractors	Engagement with the Ras Ghareb WWTP prior to start of construction. Plans in place prior to end of the disclosure period and operation Implemented during construction and operation	Waste and Wastewater Management Plan(s) in place and implemented Confirmation received that selected WWTP can accommodate Project wastewater. Where onsite wastewater treatment is stored, evidence that storage facilities have been designed and operated to achieve applicable regulatory

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	appropriately designed, operated and maintained, and that effluent disposal complies with applicable Egyptian regulatory requirements and the World Bank Group EHS Guidelines discharge standards, as applicable.					and World Bank Group EHS Guidelines. Wastewater discharge monitoring records demonstrate compliance with applicable discharge requirements.
3.3	Selected waste disposal facilities for the Projects must be licensed entities and Project shall verify their proper management and suitability for waste disposal through adequate assessment of their valid Environmental approvals.	Waste management	ESR3, OS3, PS3	Company, Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractors	Implemented during construction and operation	Report on facilities assessed validating their suitability via their approvals.
3.4	Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractors to finalise a Water Management Plan for the construction and operation phases. This plan should include appropriate measures to minimize water consumption on-site, such as the utilization of grey water for activities like dust suppression.	Water use	ESR3, OS3, PS3	Company, EPCM, BoP	Plan in place prior to end of the disclosure period and operation Implemented during construction and operation	Water Management Plan (s) in place and implemented
3.5	Incorporate resource efficiency measures (pertaining to energy, fuels, water, materials etc) into the Project ESMP/management plans and include efficiency targets/Key Performance Indicators (KPIs).	Resource Efficiency	ESR3, OS3, PS3	Company, EPCM	Prior to end of the disclosure period	ESMP/management plans in place with resource efficiency measures and KPIs detailed.

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3.6	Project to engage with the proposed water suppliers as early as possible to discuss the water needs of the Project, to ensure the suppliers can accommodate the quantity required, in particular for concrete production. In the event that the Project does decide to use groundwater as a resource, local usage of treated groundwater should be fully assessed, to ensure the Project does not impact on the availability of the resource for local communities for crop irrigation.	Water Consumption	ESR3, OS3, PS3	Company. EPCM. Internal resources / budget.	Prior to end of the disclosure period	Engagement with water suppliers – evidence of consultation records. Groundwater availability assessment carried out (as needed – should Project intend to use groundwater as a water supply)
3.7	Provide an assessment of avoided GHG emissions (in tonnes of CO ₂ e).	GHG emissions	ESR3, OS3, PS3	Company	Annually during operations	Annual avoided GHG emissions calculated and reported during operations (to consider energy produced by project, national grid emission factors, etc.)
3.10	Ensure the Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractors develop and implement a Hazardous Materials Management Plan during the construction and operation phases. The Plan shall include measures for the safe storage, handling, transportation and disposal of hazardous materials, as well as spill prevention and response procedures. The Plan shall include provision of appropriate spill response equipment, worker training, incident notification and reporting requirements, containment and clean-up procedures, and management of contaminated materials. All spills and leaks shall be contained and cleaned up immediately, irrespective of volume or whether they occur on hardstanding surfaces or unsealed ground.	Hazardous material management	ESR3, OS3, PS3	Company	Prior to the end of the disclosure period and prior to operation Implemented during construction and operation	Hazardous materials management plan, including Spill Prevention and Response Procedures, developed and implemented. Spill response equipment available onsite. Personnel trained in spill response. Spill incidents recorded, investigated and closed out in accordance with the Plan.
ESR 4/OS 4/PS 4						

ESAP #	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD ESR, AfDB OS, Best Practices)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
4.1	Finalize HSE Management Plans and Operational Control Procedures that apply to all Project activities and operations affecting the safety and health of workers. This includes situations involving technical work that requires permits, work that involves the use of personal protective equipment, as well as employees, non-employees (such as visitors, contractors, and trainees), and contractor activities in both routine and non-routine assignments. The procedure should also encompass a range of work instructions, including those pertaining to personal protective equipment (PPE) and work permits. The procedures should also take into account physical climate risks such as extreme heat, and include provisions to safeguard workers.	Worker health and safety	ESR4, OS4, PS2	Company, Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractors	Prior to disclosure Prior to operation	HSE Management Plans and Operational Control Procedures
4.2	Company to ensure that the Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractors develop an Occupational Health and Safety Plan during the construction and operation phases. H&S performance will be monitored against the Project's ESMS and H&S performance targets. The Occupational Health and Safety Plan shall include arrangements for fitness-for-work assessments, including pre-employment, periodic and return-to-work medical assessments, as appropriate to worker roles and occupational risks, to ensure personnel are medically fit to undertake their assigned duties.	Contractor H&S performance	ESR4, OS4, PS2	Company, Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractors	Prior to disclosure Prior to operation	Occupational Health and Safety Plans. Contractor and subcontractor H&S performance overseen, monitored, and reported. Fitness-for-work programme implemented, including pre-employment, periodic and return-to-work medical assessments appropriate to assigned tasks and occupational risks. Procedures in place to manage work restrictions and ensure workers are medically fit for assigned duties.

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4.3	Establish a clinic at Scatec and Siemens temporary site facility with the presence of a nurse and physician. Adequate arrangements must be made to have a fully equipped 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's safety	ESR4, OS4, PS2	Company with EPCM contractor support	Prior to end of the disclosure period	Fully equipped and appropriately licensed/certified clinic and ambulance with a contract in place with a recognised medical organisation.
4.4	Develop and implement a Workers' Influx Management Plan proportionate to the scale of the Project workforce and the potential risks and impacts associated with worker influx. The Plan will include an assessment of anticipated workforce numbers, workforce composition, workforce sourcing arrangements (including the proportion of local, regional and non-local workers), accommodation arrangements, and potential impacts on local communities, infrastructure and services. The project may incorporate the influx management plan in the overarching ESMS. This may include the support from EPCM Contractor and/or consultants. The Project will document workforce sourcing assumptions, including confirmation of the anticipated proportion of Egyptian nationals and any non-national workers, and update the assessment if workforce sourcing arrangements materially change. If construction works overlap with other major construction projects in the area, the Project will conduct an assessment of potential cumulative impacts of worker influx to the area and implement mitigation measures if necessary.	Worker influx management	ESR4, OS4, PS2/4	Company	Prior to commitment. Cumulative assessment conducted if required.	Workers' Influx Management Plan developed and implemented, satisfactory to lenders. Workforce sourcing strategy and workforce composition documented, including local recruitment commitments and anticipated workforce origin. Cumulative worker influx assessment completed where relevant and associated mitigation measures implemented.

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4.5	Develop a Flood Management Plan to set out protocols in the event of a flash flood. The plan must set out measures for the storage of materials, the location of site cabins and facilities, monitoring the potential occurrence of a flood and the safe evacuation of site operatives. An Operation and Maintenance Plan should be established outlining provisions to maintain the integrity and function of the proposed road crossings and mitigation measures. The flood risk assessment should include a statement on the residual flood risks associated with a breach or failure of the structures.	Flood risk management	ESR4, OS4, PS1	Company	Prior to financial close. Prior to start of operations.	Development of a Flood Management Plan for Operation and Maintenance phase.
4.6	The traffic impact assessment should be updated to include more detailed baseline information to fully ascertain potential impacts. A breakdown of the proposed roads to be utilised from the Ras Ghareb City and the Port to the Project should be detailed including key local communities which the route passes through (and thereby identifying potentially sensitive receptors).	Transport risk management	ESR4, OS4, PS1	Company.	Prior to financial close.	Updated Traffic Impact Assessment compiled in accordance with good practice guidance.

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4.7	Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) 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, consideration of the use of In-Vehicle Monitoring Systems (IVMS) or equivalent driver monitoring systems, and a journey management plan that covers all aspects of road transport safety. Provide regular Defensive Driving Training for all drivers, maintain records of training, attendance, vehicle maintenance, and ensure that all measures are documented and accessible for review and auditing purposes.	Transport risk management	ESR4, OS4, PS4	Company, Engineering, Procurement, Construction, Management (EPCM), High Voltage (HV), Balance of Plant (BoP) and O&M contractors	Plan in place prior to end of the disclosure period and implemented throughout construction and operation.	Transport Management Plan(s) in place satisfactory to lenders Defensive driving training programme and register to monitor records.
4.8	Develop a security management plan in accordance with the Voluntary Principles of Security and Human Rights, and the IFC Good Practise Handbook – Use of Security Forces, including procedures and code of conduct. The Plan will implement the Security strategy outlined in the ESMS Manual. Security personnel, including Bedouins, should be trained to avoid use of excessive force, and vetting for past offences should be undertaken. Avoidance of armed security at all times. Ensure any findings from the Security Risk Assessment to be carried out prior to operations are addressed with appropriate mitigation to be incorporated in the Operations phase Security Management Plan.	Security risk management	ESR4, OS4, PS4	Company	Plan in place prior to end of the disclosure period and implemented throughout construction and operation	Security management plan in place satisfactory to lenders
4.9	Develop a Community Health & Safety Plan to include detailed arrangements for managing site access during construction and operation, including fencing / physical barriers, access controls, warning signage and monitoring of security (patrols, etc.).	Public access risks.	ESR4, OS4, PS4	Company	Plan in place prior to financial close	Approved community Health and Safety Management plan in place.
ESR 6/OS 6/PS 6						

ESAP #	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD ESR, AfDB OS, Best Practices)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
6.1	Update the ESIA to include: - spring 2026 avifauna monitoring results 2026 breeding surveys monitoring results (see 6.2) - inclusion of blade patterning as a secondary mitigation measure for collision impacts for avifauna	Biodiversity Risk Management	ESR6, OS6, PS6	Company and specialist consultants and contractors	ESIA to be updated prior to disclosure by lenders.	Finalised ESIA reviewed by LESA and lenders.
6.2	A suitably experienced service provider to conduct additional surveys targeting Golden Eagle and Sooty Falcon during Spring-Autumn 2027 of both species. The surveys need to indicate where the closest confirmed nest locations are and provide sufficient information to update the Collision Risk Model for both species.	Biodiversity Risk Management	ESR6, OS6, PS6	Company and specialist consultants	Sooty Falcon survey conducted July-Oct 2027 Golden Eagle survey conducted Jan-May 2027	Contract in place for service provider Breeding season reports reviewed and acceptable to lenders.
6.3	An offset feasibility study and following Biodiversity Offset Management and Implementation Plan (BOMIP) will be required to confirm the net gain strategy for residual impacts on these species.	Biodiversity Risk Management	ESR6, OS6, PS6	Company and specialist consultants	Offset Feasibility Study: Prior to the end of the disclosure by lenders. BOMIP: 3 months Prior to project operation	Biodiversity Offset Feasibility Study and BOMIP complete and confirm viable offset options.
6.4	The BAP has been updated to include changes in the updated CHA. It is recommended that the BAP is further updated to include: Using the collision risk estimate from the CRM produced by EcoConsult for the OHTL ESIA (or alternatively providing justification why these are less relevant than the approach followed by extrapolating from the Lekela project).	Biodiversity Risk Management	ESR6, OS6, PS6	Company	Prior to the end of the disclosure period.	Finalised BAP reviewed by LESA and lenders.
6.5	The Cumulative Effects Analysis (CEA) has been revised to include changes in the updated CHA. It is recommended that the CEA is updated following further bird monitoring results for 2026, as relevant.	Biodiversity Risk Management	ESR6, OS6, PS6	Company and biodiversity contractors	Within one month from the conclusion of the 2026 bird survey	Update CEA following additional bird survey and monitoring data for 2026.
6.6	The following actions, listed in the ESIAs, will be implemented during the Project operation phase: Migratory Soaring Bird monitoring during Spring (late February to mid-May) and Autumn (mid-August to mid-November). During these periods, monitoring must take place continuously on a daily basis with full site coverage using vantage points and experienced surveyors.	Migratory soaring bird collision risk management	PS6, ESR6, OS6	Company and contractors	Start of operations and implemented throughout the life of the project. • MSB surveys: Operation (Feb-May & Aug-Nov)	Migratory soaring bird monitoring, Shutdown-on-Demand, fatality monitoring programmes implemented. Adaptive management measures implemented where

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	- Shutdown on demand following the ATMP protocol (a detailed plan must be concluded in collaboration with RCREEE, including shutdown criteria, applicable period during spring and autumn migration, team requirements ensuring a biodiversity specialist is in charge of shutdowns radar use and protocols as described in the PPA, shutdown protocol, communications protocol) - Fatality monitoring (wind turbines), including number, location and suspected cause of death of bird fatalities, bias correction trials and species-specific corrected fatality rates, following Good International Industry Practice - Monitoring of the OHTL BFDs every six months prior to the spring and autumn migration seasons. Procure the damaged or defective units and demonstrate engagement efforts for replacement by EETC before the start of the season. - Adaptive management taking into consideration the fatality thresholds presented in the Cumulative Effects Assessment (based on Population Biological Removal thresholds) must be implemented. If fatality thresholds are exceeded by the combined impacts of wind turbines and associated transmission lines, offsets must be considered in order to achieve No Net Loss and Net gain for priority species and critical habitat species, respectively (described in BAP – note that net gain is required for critical habitat species in the IBA even if thresholds are not exceeded). - Adaptive management to take consideration of recommendation of the SESA for the Gulf of Suez and potential thresholds established. This should be done in a commensurate manner considering the study is not available at the time of commitment by the Project in this ESAP and as such should be reasonable and proportionate to the biodiversity risks, impacts, and management measures committed to by the Project				- SDoD Implementation Plan developed and agreed with RCREEE prior to operation - Fatality monitoring to commence from start of operations - BFD checks every 6 months and prior to spring and autumn migration - Monitoring of fatality thresholds in CEA to confirm need for adaptive management including offsetting, and any SESA recommendations once available.	monitoring indicates additional mitigation is required. Biodiversity monitoring and performance reports submitted to lenders.
6.7	Ensure the implementation of shutdown on demand during spring and autumn migratory periods according to the protocol defined under 6.6. RCREEE is the designated partner for implementing the ATMP. The protocol must incorporate learnings from other projects in the region, such as increasing the number of vantage points to cover every turbine in the wind farm, ensure appropriate coverage of full daylight hours and ensure bi-annual (at the end of each season) review of fatality results to propose adaptive management if needed.	Migratory soaring bird collision risk management	PS6, ESR6, OS6	Company and contractors	Procedures in place six (6) months prior to start of operation. Implemented during operation	Shutdown-on-Demand procedures and ATMP implemented in accordance with Project biodiversity management requirements. Bi-annual review of monitoring and fatality data undertaken and adaptive management

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	Adaptive management may include adjusting dates for start/end date of each monitoring season, adjusting number and location of vantage points.					measures implemented where required. Monitoring and shutdown records maintained and reported to lenders.
6.8	Liaise with relevant national authorities, organisations and RCREEE to ensure that appropriate resources are available to deliver the ATMP, specifically the turbine shut down on demand programme and fatality monitoring. This would include support for the training and capacity building of local bird observers and other resources required, including on-the-job training (additional to the trained observers) preferentially utilizing people from the neighbouring town of Ras Ghareb.	Biodiversity risk management resources	PS6, ESR6, OS6	Company and biodiversity contractors	Prior to operation and during life of the project	Appropriate resources and personnel in place to implement the ATMP, including Shutdown-on-Demand and fatality monitoring requirements. Training and capacity building provided to bird observers and relevant personnel. Coordination with RCREEE and relevant authorities demonstrated.
6.9	Ensure that post-construction fatality monitoring (PCFM) is implemented according to the protocol described in recent guidance developed by the IFC, EBRD and KfW (IFC et al, 2023) in spring and autumn seasons at all wind turbines and along the entire length of the associated transmission line • A biodiversity expert will be hired to calculate corrected fatality rate estimates using 'GenEst' software following procedures in IFC et al. 2023; • Develop systematic procedures for reporting biodiversity mitigation effectiveness and impacts at the WPP. This should include procedures for: - o Reporting fatalities of priority bird species to authorities and lenders in a timely manner as per the BMP, including a review of the incident by the responsible wind and wildlife expert; - o Bi-annual reports to lenders detailing the results of soaring bird migration, shutdown on demand incidents (including near-misses), and energy production losses due to shut-down on demand, fatalities; - o Sharing survey and fatality data with the Lenders and RCREEE, and - o Implementing independent monitoring/audit of post-construction fatality monitoring procedures.	Bird fatality monitoring	PS6, ESR6, OS6	Company and biodiversity contractors	1 month prior to the start of operation and during operation	Post-construction fatality monitoring programme for the WPP implemented in accordance with approved protocols. Bi-annual monitoring and fatality reports submitted to lenders. Independent review or audit of fatality monitoring programme completed.

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6.10	Take part in the establishment of an independent scientific advisory panel to provide oversight and technical advice on the PCFM and SOD programmes, interpretation of results, and adaptive management.	Biodiversity conservation	PS6, ESR6, OS6	Company, O&M and relevant expertise	Established 2 months prior to operations, where applicable, for the entire lifetime of the project.	Taking part in the established committee
6.11	Implement the BAP, and develop and implement an Offset Feasibility Study and Biodiversity Offset Management and Implementation Plan (BOMIP) and ensure that NNL and NG, as relevant, is achieved at all times during construction and operation of the project.	Biodiversity conservation	PS6, ESR6, OS6	Company and biodiversity contractors	BAP: At all times Offset feasibility study and BOMIP: Developed and implemented during construction and into operation	Biodiversity Action Plan implemented. Offset Feasibility Study and BOMIP developed and implemented. NNL and NG objectives achieved and maintained, as applicable. Biodiversity performance monitored and reported to lenders.
6.12	The Project may assign an individual consultant to assess approaches, protocols, procedures, criteria and resulting data related to the Project's migratory soaring bird monitoring, the ATMP and post construction fatality monitoring. This would include the disclosure of relevant information and data to support such reviews as well as active engagement with relevant stakeholders, such as the expert committee (see ESAP 6.10) with appropriate level of confidentiality.	Biodiversity risk management	PS6, ESR6, OS6	Company	During the life of the Project	Relevant biodiversity monitoring data and reports, as appropriate.
ESR 8/OS 8/PS 8						
8.1	BoP and HV contractors responsible for civil works to oversee the preparation and implementation of a Chance Finds Procedure for the Project. This procedure should be designed to address any potential discoveries of new cultural heritage during the construction phase and ensure appropriate measures are taken in response.	Cultural heritage risk management	ESR8, OS8, PS8	Company	Implemented for any ongoing civil works and maintained throughout construction. Where ground disturbance activities have not yet commenced, the Procedure	Chance Finds Procedure developed, implemented and communicated to relevant personnel and contractors.

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					will be in place prior to commencement of such activities.	
ESR 10/OS 10/PS 1						
10.1	The Project will implement and maintain the Project Stakeholder Engagement Plan (SEP), as well as the public grievance mechanism. Ensure that priority is given, and resources allocated, to implement stakeholder engagement and communication activities during the construction phase.	Stakeholder engagement and information disclosure	ESR10, OS10, PS1	Company	During all project phases	Stakeholder Engagement Plan and public grievance mechanism implemented and records maintained.
10.2	Document the disclosure period including the implementation of the SEP, consultation with stakeholders and responses provided in a ESIA consultation report. This will include engagement undertaken with organisations like Birdlife International and Nature Conservation Egypt as well as Government authorities. The Consultant report will be disclosed.	Stakeholder engagement and information disclosure	ESR10, OS10, PS1	Company	At end of 60-day ESIA disclosure period	Consultant report produced and acceptable to the Lenders.



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