

Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status/Comment
PR1	Assessment and Management of Environmental and Social Impacts and Issues						
1.1	<p>Ensure an Environmental, Health & Safety and Social (EHSS) Management System in line with EBRD standards is in place.</p> <p>Ensure EHSS management system (ESMS) and associated operating procedures for project operations are based on the requirements of ISO 14001 and OHSAS 18001. In particular, the ESMS shall include construction and operation phase management plans/ procedures (as detailed in respective sections below) implemented across all facilities.</p> <p>Implement existing requirements of 2014 ESAP under Gurmat 2 Project.</p>	<p>Optimization of environmental management through a formalized system.</p> <p>Provide resources for training and monitoring of emissions</p>	EBRD PR1 Voluntary and best practice	Own resources, plus external consultants if required	<p>Commence implementation immediately</p> <p>Continue throughout construction and operation</p>	<p>ESMS in place and related plans/procedures implemented.</p> <p>Annual report submitted to the Lenders.</p>	
1.2	<p>Collaborate with key stakeholders (related governmental authorities, associations, etc.) to undertake a potential cumulative environmental and social impact assessment, covering the operation of existing and reasonably foreseeable future GPP projects in the region.</p>	<p>Mitigating the potential negative cumulative impacts is not solely the responsibility of Gurmat. Other project owners, relevant local and national authorities should also take responsibility to mitigate the potential impacts.</p>	Best practice	Internal or external if needed	2018-2022	<p>Progress reported within the scope of the annual report to the Lenders.</p>	<p>We note that data will be treated confidential and disclosed anonymous, unless agreed with Guris</p>

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1.3	EHSS training of staff and contractors and EHSS Monitoring: Continue routine monitoring procedures covering NCGs/ GHGs, H ₂ S (hydrogen sulphide), noise, grievance redress, OHS statistics and waste management. Undertake min annual monitoring. Provide information to the Lenders on any serious accidents and incidents. Ensure skilled, on-site person(s) are employed for management of HSE issues during both construction and operation phases.	Optimization of environmental and social management through training and monitoring of emissions	EBRD PR1	Own resources, and external consultants if required	Assess immediately and commence implementation of required measures immediately Continue throughout construction and operation	Monitoring results. Results evaluated and reported within the scope of the annual report to the Lenders. Specific personnel for HSE management employed.	
PR2	Labour and Working Conditions						
2.1	Human Resource Policies & Management System: Develop a Human Resources (HR) Policy in line with EBRD PR2. HR Policy and HR Management System should cover all employees, contractors (EPC and O&M) and sub-contractors. The policy to provide for oversight of contractor policies/ procedures.	To ensure management of workforce in line with EBRD PR2 requirements including prevention of child labor, forced labor, retrenchment principles and encouragement of non-discrimination.	EBRD PR2	Own resources	Commence implementation immediately	HR Policy and HR Management System up to EBRD PR2 standards in place. Progress reported within the scope of the annual report to the Lenders.	
2.2.	Worker Accommodation: Ensure campsites are designed and operated in compliance with EBRD and IFC's Workers' accommodation: processes and standards.	To standardize accommodation provided to workers employed by the Project Company and contractors	EBRD PR2	Own resources, EPC contractor	Assess immediately and commence implementation of required measures immediately Continue throughout construction	Accommodation in line with IFC's Workers' accommodation: processes and standards provided and issues/ progress reported within the scope of the annual report to the Lenders.	

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2.3.	Grievance Mechanism Maintain and implement the formal grievance mechanisms for Gurmat Elektrik, EPC and O&M, contractor employees, and non-employee workers. Disseminate information about its uses to the workforce.	To provide a channel for raising workers concerns and transparent, consistent mechanism for resolution.	EBRD PR2	Own resources, external consultants (if required)	Continue throughout construction and operation	Grievance mechanism in place and implemented.	
2.4.	Existing Contactor Management Procedure shall ensure Project specific E&S policies and MPs are followed and implemented by all contractors and subcontractors.	GIIP	EBRD PR2	Own resources, external consultants (if required)	Assess immediately and implement necessary measures throughout all facilities	Contactor Management Procedure updated. Issue reported to Lenders within the scope of the annual report.	
PR3	Resource Efficiency and Pollution Prevention and Control						
3.1	Conduct continuous, online GHG monitoring at Capacity Extension GPPs. Provide a detailed breakdown of GHG emissions to Lenders on an annual basis, including an update on the success of any supplemental measures taken to reduce emissions. Data will include details of emission per MWh as well as total carbon emissions.	GIIP Monitoring of operational impacts associated with Greenhouse Gas Emissions.	EBRD PR3	Own resources, external consultants (if required)	Continue monitoring at Efe-6. Start monitoring when Efe-7 is commissioned. Install monitoring system at Efe-8 and start monitoring when Efe-8 is commissioned. Report annually	Monitoring results. GHG emissions and performance of any additional measures reported to Lenders within the scope of the annual report.	

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3.2	Evaluate applicable mitigation alternatives to reduce carbon emissions in the short term to medium term and implement feasible alternatives with the aim to operate plant for average carbon emission below the National Grid level in the long term.	The Company will try develop carbon reduction program through: <ul style="list-style-type: none"> - Operational control and re-injection - Carbon capture and storage/ use/ selling to 3rd party industries - Other feasible techniques 	EBRD PR1 EBRD PR3	Own resources	Ongoing	Mitigation alternatives evaluated and related information reported to Lenders within the scope of the annual report.	
3.3	Within 3 years of operations undertake a review (independent) of whether GHG emission can be reduced from the plant, and develop a feasibility study to be presented to Lenders on options available.	The report will review if it is possible to further reduce GHG emissions	EBRD PR3	External consultants	In three years following commissioning of Efe-8.	Independent review and feasibility study conducted, results reported to Lenders.	

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3.4	<p>Within one year of commissioning Efe-8, undertake an independent EHSS audit for the capacity extension (Efe-6, Efe-7 and Efe-8) GPPs, which will include:</p> <ul style="list-style-type: none"> - Review audit results of Gurmat-2 (Efe-1, Efe-2, Efe-3 and Efe-4 GPPs) - Review and verify carbon emissions - Review and verify noise impacts (including monitoring) - Review cumulative impacts of projects in the areas on local community, local agricultural and nature etc. if required by the governmental authority - Review and verify hydrogen sulphide emissions - Review grievance procedure as well as land allocation and use - Review implementation of SEP <p>The Report will include recommendations, which will be discussed and agreed with the Lenders and implemented by the Company to ensure compliance with the ESAP and Loan agreement conditions.</p>	The commissioning report will review how the plants have been developed, and whether the ESAP and EIA requirements have been met.	EBRD PR3	Own resources, External consultants	Within one year of commissioning of Efe-8 and annually thereafter.	Audit Report submitted to Lenders.	
PR4	Health and Safety						
4.1	Existing Occupational H&S Procedure shall be updated to include the capacity extension GPPs, in line with EBRD PR4.	<p>Minimize occupational injuries/fatalities due to accidents</p> <p>Optimized health and safety performance.</p>	EBRD PR4 Best Practice	Own resources, external consultants (if required)	Continue throughout construction and operation	Occupational H&S Plan in place and implemented	

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4.2	Existing Gurmat-2 health and safety committee's work scope shall be updated to cover the Efe-6, Efe-7 and Efe-8 GPPs or establish a new committee for these GPPs.	Minimize occupational injuries/fatalities due to accidents Optimized health and safety performance.	EBRD PR4	Own resources, external consultants (if required)	Commence implementation immediately Continue throughout construction and operation	HS Committee work scope covers Efe-6, Efe-7 and Efe-8 GPPs.	
4.3	Existing Emergency Response Plan and any other H&S related documentation will be revised for the capacity extension Project.	Optimized health and safety performance.	EBRD PR4 Best Practice	Own resources, external consultants (if required)	Commence implementation immediately Continue throughout construction and operation	Updated Emergency Response Plan, and any other plan/document in place and implemented.	
4.4	Conduct a H&S risk assessment study for the capacity extension GPPs.	Optimized health and safety performance.	EBRD PR4 Best Practice	Own resources, external consultants (if required)	Conduct study immediately Continue throughout construction and operation	H&S Risk Assessment in place.	
PR8	Cultural Heritage						
8.1	Chance finds shall be handled in line with related national legislation and relevant authorities are informed in case of a chance find.	Any archaeological finds will be preserved during the construction process	EBRD PR8	Own resources	Commence implementation immediately Continue throughout construction	Chance Finds Procedure adopted. All staff, including EPC Contractor, trained in implementation	

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PR10	Information Disclosure and Stakeholder Engagement						
10.1	Implement the SEP and the grievance mechanism. As part of the SEP, maintain a register of external communications including minutes of meetings held with stakeholders.	To maintain good stakeholder engagement and framework for sharing information with the public	EBRD PR10 Best Practice	Own resources	Commence implementation immediately Continue throughout construction and operation	Information on material grievances received and how these are addressed/ resolved provided to Lenders as part of the annual report.	
10.2	ESIA Addendum, SEP, NTS and ESAP to be disclosed locally and on web site until the end of the third year from the COD of Efe-8. Implement the requirements of the Lenders ESIA disclosure package and National legislation. Provide an update on the implementation of the SEP and ESAP.	The Lender ESIA disclosure document contains information on the project design and implementation as well as compliance. This will be used to benchmark the plants EHSS performance	EBRD PR 10	Internal	Until the end of the third year from the COD of Efe-8.	Documents available locally and on web sites	
10.3	Conduct external reporting to public, covering project progress, CSR activities and other relevant information. Provide full data to Lenders on H2S and GHG emission.	To maintain good stakeholder engagement, implement best practice, disclose annual non-financial information.	EBRD PR 3 EBRD PR 10 Best Practice	Internal	Annual	Information disclosed on web-site.	Provide on line summary and as part of annual CSR report.
10.4	Develop and implement a Corporate Social Responsibility (CSR) Programme for the Project and disclose relevant information to public.	To maintain good stakeholder engagement.	EBRD PR 10 Best Practice	Internal	Programme developed within 1 year of commissioning of Efe-8. Annual reporting.	CSR Programme in place. Information (covering CSR activities) disclosed on web-site. Reporting of monitoring data to be made by the Company every 3 years on website and/or as part of CSR reporting as appropriate.	