

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, Policy, Good Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
<b>EBRD Performance Requirement 1: Assessment and Management of Environmental and Social Risks and Impacts</b>						
1.1	Develop and implement a Quality Management System based on ISO9001 to cover all SPV's activities both for the Construction and Operation Phases.	Optimisation of quality management through a formalised system.	• EBRD PR 1 • Best Practice	SPV	• One (1) year for the development of the formal Quality Management System, after the Execution Date of the PA. • Certification within the second year, after the Execution Date of the PA.	• Develop and implement a Quality Management System and attain ISO9001:2015 certification.
1.2	Appoint a qualified Quality Manager to manage and report on the Quality aspects of the Project, during both the Construction and Operation Phases.	Optimisation of quality management through a formalised system.	• EBRD PR 1 • Best Practice	SPV	Three (3) months after the Execution Date of the PA.	-
1.3	Develop and implement a robust Quality Training Plan.	Optimisation of quality management through a formalised system.	• EBRD PR 1 • Best Practice	SPV	Six (6) months after the Execution Date of the PA.	-
1.4	Develop and implement an Environmental Management System based on ISO14001 to cover all SPV's activities both for the Construction and Operation Phases.	Optimisation of environmental management through a formalised system.	• EBRD PR 1 • Best Practice	SPV	• One (1) year for the development of the formal Environmental Management System, after the Execution Date of the PA. • Certification within the second year, after the Execution Date of the PA.	• Develop and implement an Environmental Management System and attain ISO14001:2015 certification. • Issue Annual EHS Reports to the Interested Parties, including the MLA.
1.5	Appoint a qualified Environmental Manager to manage and report on the Environmental aspects of the Project, during both the Construction and Operation Phases.	Optimisation of environmental management through a formalised system.	• EBRD PR 1 • Best Practice	SPV	Three (3) months after the Execution Date of the PA.	-
1.6	Develop and implement a robust Environmental Training Plan.	Optimisation of environmental management through a formalised system.	• EBRD PR 1 • Best Practice	SPV	Six (6) months after the Execution Date of the PA.	-
1.7	Develop and implement an Occupational Health and Safety Management System based on ISO45001 to cover all SPV's activities both for the Construction and Operation Phases.	Optimisation of occupational health and safety management through a formalised system.	• EBRD PR 1 • Best Practice	SPV	• One (1) year for the development of the formal Occupational Health and Safety Management System, after the Execution Date of the PA. • Certification within the second year, after the Execution Date of the PA.	• Develop and implement a Occupational Health and Safety Management System and attain ISO45001:2018 certification. • Issue Annual EHS Reports to the Interested Parties, including the MLA.
1.8	Appoint a qualified Occupational Health and Safety Manager to manage and report on the H&S aspects of the Project, during both the Construction and Operation Phases.	Optimisation of occupational health and safety management through a formalised system.	• EBRD PR 1 • Best Practice	SPV	Three (3) months after the Execution Date of the PA.	-
1.9	Develop and implement a robust Occupational Health and Safety Training Plan.	Optimisation of occupational health and safety management through a formalised system.	• EBRD PR 1 • Best Practice	SPV	Six (6) months after the Execution Date of the PA.	-
1.10	Develop and implement robust a DCC Contractor and a O&M Contractor Management System, in accordance with the respective DCC and O&MC and the ISO 9001-2015 Standard.	Avoidance/minimisation of environmental, occupational health and safety incidents and associated liability	• EBRD PR 1 • Best Practice	SPV / Sponsor	• Three (3) months after the Execution Date of the PA. • On-going training as per the Plan during Construction and Operation Phases.	• Effective management of the DCC Contractor and to the O&M Contractor. • Provide training to the DCC Contractor and to the O&M Contractor. • Minimise environmental incidents. • Minimise occupational health and safety incidents.
1.11	Require the DCC Contractor to appoint and employ a qualified Expert (with a direct reporting line to the DCC Contractor's Director) responsible for the effective implementation of the E&S obligations as per the DCC Contract and for the compliance of the DCC Contract activities. DCC Contractor to roll this action out to the key Sub-Contractors.	Compliance of the DCC Contractor on Environmental and Social matters	• EBRD PR 1 • Best Practice	• SPV / Sponsor • DCC Contractor	• Three (3) months after the Execution Date of the PA.	• DCC Contractor to appoint a qualified Expert to manage compliance with E&S obligations of the DCC Contract. • Qualified Expert to monitor compliance of the key Sub-contractors.

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1.12	Require the O&M Contractor to appoint and employ a qualified Expert (with a direct reporting line to the O&M Contractor's Director) responsible for the effective implementation of the E&S obligations as per the O&M Contract and for the compliance of the O&M Contract activities. DCC Contractor to roll this action out to the key Sub-Contractors.	Compliance of the O&M Contractor on Environmental and Social matters	<ul style="list-style-type: none"> <li>EBRD PR 1</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV / Sponsor</li> <li>O&amp;M Contractor</li> </ul>	<ul style="list-style-type: none"> <li>Three (3) months after the Execution Date of the PA.</li> </ul>	<ul style="list-style-type: none"> <li>O&amp;M Contractor to appoint a qualified Expert to manage compliance with E&amp;S obligations of the EPC Contract.</li> <li>Qualified Expert to monitor compliance of the key Sub-contractors.</li> </ul>
1.13	<ul style="list-style-type: none"> <li>Develop and implement an Emergency Response Plan to address Environmental and Occupational Health and Safety Incidents, during both the Construction and Operation Phases.</li> <li>Form and train an Environmental and Occupational Health and Safety Incident Response Team.</li> </ul>	Avoidance/minimisation of environmental, occupational health and safety incidents and associated liability	<ul style="list-style-type: none"> <li>EBRD PR 1</li> <li>Best Practice</li> </ul>	SPV	<ul style="list-style-type: none"> <li>Six (6) months after the commencement date of the construction works.</li> <li>On-going training as per the Plan during Construction and Operation Phases.</li> </ul>	<ul style="list-style-type: none"> <li>Develop and implement an Emergency Response Plan.</li> <li>Form an Incident Response Team and provide training to ensure immediate response in cases of environmental and occupational health and safety incidents / accidents.</li> </ul>
1.14	Develop and implement a robust Environmental and Social Management Plan (ESMP) and incorporate ESMP obligations in the DCC and O&M Contracts.	Ensure DCC & O&M Contractors will deliver all ESIA and ESMP requirements.	<ul style="list-style-type: none"> <li>EBRD PR 1</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> <li>O&amp;M Contractor</li> </ul>	Six (6) months after the commencement date of the construction works.	Ensure ESMP requirements are incorporated in the DCC and O&M Contracts.
1.15	Develop and implement a Grievance System to effectively address any Environmental and Occupational Health and Safety issues reported by the Stakeholders.	Improved relationship with the local population and stakeholders.	<ul style="list-style-type: none"> <li>EBRD PR 1</li> <li>Best Practice</li> </ul>	SPV	<ul style="list-style-type: none"> <li>Three (3) months after the commencement date of the construction works.</li> </ul>	<ul style="list-style-type: none"> <li>Target no complaints.</li> <li>Target early resolution of issues with local population and Stakeholders.</li> </ul>
1.16	<ul style="list-style-type: none"> <li>Appointment of an Independent Agent (independent entity other than the DCC Contractor) to undertake the Completion Tests with the cooperation of the DCC Contractor during the Testing Periods of the PPP, to assess compliance of the Project against performance targets.</li> <li>Commission internal Annual Audits during Operation Phase to assess compliance of the Project against annual performance targets.</li> <li>Commission independent Environmental and Social Audits on a five (5) year basis during Operation Phase to review performance and assess compliance of the Project.</li> </ul>	Assurance of legal compliance.	<ul style="list-style-type: none"> <li>EBRD PR 1</li> <li>Best Practice</li> </ul>	SPV / Sponsor	<ul style="list-style-type: none"> <li>At the Commissioning Stage of the Project.</li> <li>Annual Audit Reports implemented internally to monitor and assess compliance.</li> <li>Independent E&amp;S Audit Reports implemented by independent Experts to monitor the performance and assess the compliance of the Project.</li> </ul>	<ul style="list-style-type: none"> <li>Assurance of legal compliance.</li> <li>Assurance of compliance with EBRD's PR 1.</li> </ul>
1.17	Develop a Procedure to monitor and report on compliance with all Project Authorisations (Permits), including the Approval of the Environmental Terms as amended periodically.	Assurance of legal compliance.	<ul style="list-style-type: none"> <li>EBRD PR 1</li> <li>Best Practice</li> </ul>	SPV / Sponsor	Immediate (upon execution of the PA).	<ul style="list-style-type: none"> <li>Ensure that all Permits and other Project Authorisations are received.</li> <li>Reports issued to the Authorities and communicated to the MLA.</li> </ul>
1.18	Develop and implement a Corporate Social Responsibility (CSR) Programme.	Establishment and delivery of appropriate and sustainable community benefits	<ul style="list-style-type: none"> <li>EBRD PR 1</li> <li>Best Practice</li> </ul>	SPV / Sponsor	<ul style="list-style-type: none"> <li>Three (3) months after the Construction Works Commencement Date.</li> </ul>	<ul style="list-style-type: none"> <li>Publish of Annual CSR Reports.</li> </ul>

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<b>EBRD Performance Requirement 2: Labour and Working Conditions</b>						
2.1	Develop and implement an HR policy and procedures to meet national legislation requirements, such as:- <ul style="list-style-type: none"> <li>Grievance resolution,</li> <li>Worker engagement,</li> <li>Workers right to join a union at their own choice</li> <li>Non-discrimination and equal opportunity</li> <li>Retrenchment</li> <li>Disciplinary procedures</li> <li>Collective Agreement</li> <li>Equal pay for equal work</li> <li>Gender Equality</li> <li>Bullying and harassment</li> <li>Child labour and forced labour</li> <li>Overtime, working hours</li> <li>Work-life balance</li> <li>Wages, benefits, and conditions of work and accommodation</li> <li>Social security of permanent and temporary employees</li> </ul>	Improved human resources practices and compliance with national legislation requirements.	<ul style="list-style-type: none"> <li>Legislative Requirement</li> <li>EBRD PR 2</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> <li>O&amp;M Contractor</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date.</li> <li>On-going through both Construction and Operation Phases.</li> </ul>	<ul style="list-style-type: none"> <li>HR Policy of the SPV issued and implemented.</li> <li>HR Policy of the DCC Contractor issued and implemented.</li> <li>HR Policy of the O&amp;M Contractor issued and implemented.</li> </ul>
2.2	Develop and implement an Occupational Health and Safety Management System based on ISO45001 (please see actions 1.7, 1.8 and 1.9 above).	Optimisation of H&S management through a formalised system.	<ul style="list-style-type: none"> <li>EBRD PR 2</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> <li>Operator</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date.</li> <li>On-going through both Construction and Operation Phases.</li> </ul>	<ul style="list-style-type: none"> <li>Operate an efficient H&amp;S Management System.</li> <li>ISO45001 certification.</li> </ul>
2.3	<ul style="list-style-type: none"> <li>Develop and implement a staff H&amp;S Training Plan for new SPV's Employees.</li> <li>Ensure similar compliance of the DCC Contractor and the O&amp;M Contractor regarding their Employees / Workers.</li> </ul>	Avoidance/minimisation of accidents and associated liability	<ul style="list-style-type: none"> <li>Legislative Requirement</li> <li>EBRD PR 2</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> <li>O&amp;M Contractor</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date.</li> <li>On-going through both Construction and Operation Phases.</li> </ul>	<ul style="list-style-type: none"> <li>All SPV's Employees are inducted to H&amp;S Training prior to start of work.</li> <li>All DCC Contractor's and O&amp;M Contractor's Employees / Workers are inducted to H&amp;S Training prior to start of work.</li> </ul>
2.4	<ul style="list-style-type: none"> <li>Develop and implement a Personal Protective Equipment procedure for SPV's Employees.</li> <li>Ensure similar compliance of the DCC Contractor and the O&amp;M Contractor regarding their Employees / Workers.</li> </ul>	Avoidance/minimisation of accidents and associated liability	<ul style="list-style-type: none"> <li>Legislative Requirement</li> <li>EBRD PR 2</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> <li>O&amp;M Contractor</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date.</li> <li>On-going through both Construction and Operation Phases.</li> </ul>	<ul style="list-style-type: none"> <li>Implement an Incident and Injury Free target.</li> <li>All SPV's Employees and all DCC Contractor's and O&amp;M Contractor's Employees / Workers are using PPE at work.</li> </ul>
2.5	SPV to develop and implement an Equal Opportunities Action Plan to promote good HR policies and practices with respect to gender and equal opportunities in the SPV's workforce and in its supply chain and to increase the share of its female workforce through improvements to HR policies and practices on a best-effort basis and to the extent practicably and realistically possible, taking into consideration the socio-economic environment in which the client operates.	Improved human resources practices and compliance with national legislation requirements.	<ul style="list-style-type: none"> <li>Legislative Requirement</li> <li>EBRD PR 2</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> <li>O&amp;M Contractor</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date.</li> <li>On-going through both Construction and Operation Phases.</li> </ul>	Equal Opportunities Action Plan issued and implemented.
2.6	SPV to establish a Formal Employee Grievance Mechanism for all direct employees and provide them information on channels for internal communication and raising grievances. The workers should be informed of the mechanism and procedures at the time of hire in their local language. As a best practice, options of anonymous grievance mechanism should be established to encourage concerns to be raised freely.	Improved human resources practices and compliance with national legislation requirements.	<ul style="list-style-type: none"> <li>Legislative Requirement</li> <li>EBRD PR 2</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> <li>O&amp;M Contractor</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date.</li> <li>On-going through both Construction and Operation Phases.</li> </ul>	<ul style="list-style-type: none"> <li>Formal Employee Grievance Mechanism issued and implemented.</li> <li>Establish a complain tracker.</li> </ul>
2.7	Ensure that all machinery used during Construction Phase fully complies with national environmental and health and safety standards.	Avoidance/minimisation of accidents and associated liability	<ul style="list-style-type: none"> <li>Legislative Requirement</li> <li>EBRD PR 2</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> <li>O&amp;M Contractor</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date.</li> <li>On-going through both Construction and Operation Phases.</li> </ul>	Avoid complaints from SPV's Employees and DCC Contractor's and O&M Contractor's Employees / Workers.

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<b>EBRD Performance Requirement 3: Resource Efficiency and Pollution Prevention and Control</b>						
3.1	Develop and implement a Solid Waste Management Plan for all non-earthen wastes, including chemicals, fuel, oil, construction debris, etc. and ensure off-site management by licensed companies and in licensed places.	Ensure effective pollution prevention and control.	<ul style="list-style-type: none"> <li>Legislative Requirement</li> <li>EBRD PR 3</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> <li>O&amp;M Contractor</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date along with the ESMP (Action 1.11).</li> <li>On-going throughout the Construction and Operation Phases.</li> </ul>	<ul style="list-style-type: none"> <li>All wastes are managed in accordance with the Plan.</li> <li>Reports to the Authorities on amounts, types and management of all solid wastes.</li> <li>Reports are also communication to the MLA.</li> </ul>
3.2	Develop and implement plan for transport and management of spoil from the Project's excavations, including at a minimum:- <ul style="list-style-type: none"> <li>Temporary on-site storage kept to a minimum level and in secure locations.</li> <li>Transported in accordance with traffic management plan (please see action 4.1 below).</li> <li>Dispose in secure and authorized locations.</li> </ul>	Ensure effective pollution prevention and control.	<ul style="list-style-type: none"> <li>Legislative Requirement</li> <li>EBRD PR 3</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> <li>O&amp;M Contractor</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date along with the ESMP (Action 1.11).</li> <li>On-going throughout the Construction and Operation Phases.</li> </ul>	<ul style="list-style-type: none"> <li>Reports to the Authorities, as required by Project Authorisation.</li> <li>Reports are also communication to the MLA.</li> </ul>
3.3	Develop and implement an Air Quality Management Plan to control construction dust and vehicle emissions, to include (at a minimum):- <ul style="list-style-type: none"> <li>Periodic monitoring near construction/traffic areas for visible dust.</li> <li>Maintain vehicles/equipment in good running condition.</li> <li>Obey speed limits in traffic management plan (please see action 4.1 below).</li> <li>Cover loads as needed to prevent dust.</li> </ul>	Ensure effective pollution prevention and control.	<ul style="list-style-type: none"> <li>Legislative Requirement</li> <li>EBRD PR 3</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date along with the ESMP (Action 1.11).</li> <li>On-going throughout the Construction Phase.</li> </ul>	<ul style="list-style-type: none"> <li>Reports to the Authorities, as required by Project Authorisation.</li> <li>Reports are also communication to the MLA.</li> </ul>
3.4	Develop and implement an Erosion and Sedimentation Control Plan for all affected areas where the ground will be disturbed during the Construction Phase, to comply with clause 5.1.17 of the Approved Environmental Terms of the PPP.	Ensure effective pollution prevention and control.	<ul style="list-style-type: none"> <li>Legislative Requirement</li> <li>EBRD PR 3</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date along with the ESMP (Action 1.11).</li> <li>On-going throughout the Construction Phase.</li> </ul>	<ul style="list-style-type: none"> <li>Minimise erosion into streams.</li> <li>Reports to the Authorities, as required by Project Authorisation.</li> <li>Reports are also communication to the MLA.</li> </ul>
3.5	Provide portable toilets and welfare facilities or other means to contain sanitary wastes as needed, at all work locations and discharge wastes to appropriate treatment as required.	Ensure effective pollution prevention and control.	<ul style="list-style-type: none"> <li>Legislative Requirement</li> <li>EBRD PR 3</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date along with the ESMP (Action 1.11).</li> <li>On-going throughout the Construction Phase.</li> </ul>	<ul style="list-style-type: none"> <li>No unauthorised discharges.</li> <li>No discharges of untreated sanitary wastes.</li> </ul>
3.6	Develop and implement program for vegetation clearing and removal, including at a minimum:- <ul style="list-style-type: none"> <li>Minimize land-clearing as much as possible.</li> <li>Design and implement erosion controls (please see action 3.4 above) immediately after ground disturbance.</li> <li>Carefully manage deadwood and other dry vegetation to prevent fire hazard.</li> </ul> <i>Relevant Approved Environmental Terms - Clauses 5.1.17, 5.2.5.6.2, 5.2.12, 7.5.2, 7.5.6, 7.5.7, 7.5.8.</i>	Ensure effective pollution prevention and control.	<ul style="list-style-type: none"> <li>Legislative Requirement</li> <li>EBRD PR 3</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date along with the ESMP (Action 1.11).</li> <li>On-going throughout the Construction Phase.</li> </ul>	Efficient vegetation management.

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3.7	Develop and implement a Water Quality Monitoring Programme, to include:- • Monitor total suspended solids of all construction activities, with results used to modify erosion controls and construction methods as needed. • Visually observe apparent water turbidity of construction, with appropriate action to reduce turbidity due to erosion. • Monitor dissolved oxygen in reservoirs, and if needed action to prevent development of anaerobic conditions. <i>Relevant Approved Environmental Terms clauses 5.3.1.3, 5.3.1.4.5, 5.3.1.4.6, 5.3.2.2, 5.3.10.4.7.</i>	Ensure effective pollution prevention and control.	• Legislative Requirement • EBRD PR 3 • Best Practice	• SPV • DCC Contractor • O&M Contractor	• By the Construction Works Commencement Date along with the ESMP (Action 1.11). • On-going throughout the Construction Phase.	• Reports to the Authorities, as required by Project Authorisation. • Reports are also communication to the MLA.
3.8	Flush sediments downstream only during periods of high water flow rates, as defined in the Approval Decision of the Environmental Terms of the PPP (Ref. No. ΥΠΕΝ/ΔΙΠΑ/37919/2484 - 24/04/2019 [ΑΔΑ: 6ΡΔΧ4653Π8-Λ15])	Ensure effective pollution prevention and control.	• Legislative Requirement • EBRD PR 3 • Best Practice	SPV O&MC Contractor	• Prior to the commencement of the Operation Phase. • On-going throughout the Operation Phase.	No sediment discharges without Authorisation.
3.9	Manage/dispose of sediments physically removed from reservoirs and/or intakes only as approved by the Authorities, as defined in the Approval Decision of the Environmental Terms of the PPP. (Ref. No. ΥΠΕΝ/ΔΙΠΑ/37919/2484 - 24/04/2019 [ΑΔΑ: 6ΡΔΧ4653Π8-Λ15])	Ensure effective pollution prevention and control.	• Legislative Requirement • EBRD PR 3 • Best Practice	SPV O&MC Contractor	• Prior to the commencement of the Operation Phase. • On-going throughout the Operation Phase.	No unauthorized disposal of sediment.
<b>EBRD Performance Requirement 4: Health, Safety and Security</b>						
4.1	Develop and implement procedures to protect public health and safety, to include (but not be limited to):- • Traffic management plan for all drivers and equipment operators (speed limits, training, routes to follow, avoidance of sensitive areas). • Public notice of construction operations near areas close to the boundaries of the Project, accessible by the Public. • Security as needed to prevent unauthorized access to project locations, with appropriate training for guards.	Ensure effective protection of the Public on Health, Safety and Security matters.	• EBRD PR 4 • Best Practice	• SPV • DCC Contractor	• By the Construction Works Commencement Date. • On-going throughout the Construction Phase.	• Consultation with the Authorities on Public Health and Safety Matters. • Quarterly reports are issued to the MLA, including incidents and/or accidents involving the Public.
4.2	Establish a Code of Conduct and enforce rules for the DCC Contractor's Employees / Workers, when engaging with local residents and visitors to prevent adverse impacts.	Ensure effective protection of the Public on Health, Safety and Security matters.	• EBRD PR 4 • Best Practice	• SPV • DCC Contractor	• By the Construction Works Commencement Date. • On-going throughout the Construction Phase.	• Audit Reports are issued to the relevant Authorities. • Audit Reports are also communicated with the MLAs.
4.3	Prepare and implement a Dam Safety Monitoring Plan and commission regular Dam Safety Audits by independent Experts. <i>Relevant Approved Environmental Terms - Clause 5.3.6</i>	Ensure effective Dam safety.	• Legislative Requirement • EBRD PR 4 • Best Practice	• SPV • DCC Contractor • O&M Contractor	• Three (3) months after Construction Works Commencement Date. • On-going throughout the Construction Phase.	• Audit Reports are issued to the relevant Authorities. • Audit Reports are also communicated with the MLAs.
4.4	Develop a Noise and Vibration Monitoring and Control Programme.	Minimise off-site disturbance.	• Legislative Requirement • EBRD PR 4 • Best Practice	• SPV • DCC Contractor	• By the Construction Works Commencement Date. • On-going throughout the Construction Phase.	Implement noise/vibration abatement measures.



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4.5	Ensure through the OHS management system that no new activity/work starts unless an on-site job- and task-specific hazard analysis was undertaken in presence of the Employees / Workers and of a qualified OHS supervisor/manager, including the following aspects:- <ul style="list-style-type: none"> <li>Induction of the Employees / Workers prior to the commencement of their Work on the Project site;</li> <li>Personal and Collective Protection Equipment;</li> <li>Record-keeping, including near misses and incidents;</li> <li>Lessons Learnt and Toolbox talks to share information on risks, accident prevention, etc.;</li> <li>Medical records of all Employees / Workers in accordance with the local legislative requirements.</li> </ul> <i>It is confirmed that all Medical Records will be available only to the appointed and designated Health Physician (Ιατρος Εργασίας), who should evaluate them and provide Declarations that a subject Worker is suitable (or not) to undertake its responsibilities. All these Information and Records are of course sensitive and we expect that they will be treated accordingly.</i>	Ensure effective protection of the Public on Health, Safety and Security matters.	<ul style="list-style-type: none"> <li>Legislative Requirement</li> <li>EBRD PR 4</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> <li>O&amp;M Contractor</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date.</li> <li>On-going throughout the Construction and Operation Phases.</li> </ul>	Implement on-site task-specific hazard analysis.
4.6	<ul style="list-style-type: none"> <li>Develop and implement Emergency Response Plans (indicatively but not limited to natural hazards, earthquakes, landslides, floods, etc.) for the Project throughout the Construction and Operation Phases.</li> <li>Develop and implement a robust Emergency Response Plan (in Greek "Σχέδιο Αντιμετώπισης Επικινδύνων Καταστάσεων (ΣΑΕΚ)") for the Dam, throughout the Operation Phase.</li> <li>Ascertain induction and on-going training of the Employees / Workers focused on the Emergency Response Plans above.</li> </ul> <i>Relevant Approved Environmental Terms - Clause 5.3.6</i>	<ul style="list-style-type: none"> <li>Ensure effective protection of the Public on Health, Safety and Security matters.</li> <li>Dam safety.</li> </ul>	<ul style="list-style-type: none"> <li>Legislative Requirement</li> <li>EBRD PR 4</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> <li>O&amp;M Contractor</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date.</li> <li>On-going throughout the Construction and Operation Phases.</li> </ul>	<ul style="list-style-type: none"> <li>Emergency Response Plans for the Project.</li> <li>Emergency Response Plans for the Dam particularly.</li> </ul>
<b>EBRD Performance Requirement 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</b>						
5.1	Develop and implement a PPP Areas Handover Review Procedure which will thoroughly assess the draft PPP Areas Handover Protocol which will be communicated by the Contracting Authority and an Action Plan for the acceptance of the PPP Areas in accordance with the requirements defined by the Lenders. <i>It is expected that all PPP Areas that will not be handed over to the SPV upon execution of the PA, are treated as a Compensation Event in virtue of the PA.</i>	<ul style="list-style-type: none"> <li>Avoidance or minimize displacement.</li> <li>Compensation for displaced people.</li> </ul>	<ul style="list-style-type: none"> <li>EBRD PR 5</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>Contracting Authority (Ministry of Rural Development and Food)</li> <li>SPV</li> </ul>	<ul style="list-style-type: none"> <li>By the Execution Date of the PA (and the PPP Areas Handover Protocol).</li> <li>On-going throughout the Construction Phase.</li> </ul>	Execution of a PPP Areas Handover Protocol to the satisfaction of the Lenders.
5.2	Establish and maintain a robust Mechanism to ensure that all private land affected by the construction and operation of the Project is previously acquired (or leased) by the Contracting Authority (and/or the SPV).	<ul style="list-style-type: none"> <li>Avoidance or minimize displacement.</li> <li>Compensation for displaced people.</li> </ul>	<ul style="list-style-type: none"> <li>EBRD PR 5</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>Contracting Authority (Ministry of Rural Development and Food)</li> <li>SPV</li> </ul>	<ul style="list-style-type: none"> <li>By the Execution Date of the PA (and the PPP Areas Handover Protocol).</li> <li>On-going throughout the Construction Phase.</li> </ul>	Monitor the expropriation and/or acquisition of land affected by the construction and operation of the Project, prior to the commencement of the construction works.
<b>EBRD Performance Requirement 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>						
6.1	Separate topsoil from subsoil, surface vegetation and other spoil and store in secure areas, as defined in the Approval Decision of the Environmental Terms of the PPP. Protect storage piles with covers, including vegetative cover (native grass species) as needed to prevent erosion and desiccation.	Ensure effective biodiversity conservation and sustainable management of living natural resources.	<ul style="list-style-type: none"> <li>Legislative Requirement</li> <li>EBRD PR 6</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> </ul>	On-going through Construction Phase (recover and segregate at initial ground works and store until reuse).	Maximise recovery of topsoil.

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, Policy, Good Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
6.2	Develop and implement a comprehensive Biomonitoring Programme, including fish, aquatic macroinvertebrates, and aquatic habitat in all affected streams, as defined in the Approval Decision of the Environmental Terms of the PPP. Data must be sufficient to establish robust baseline and to identify changes due to project activities. <i>Relevant Approved Environmental Terms - Clause 5.3.6</i>	Ensure effective biodiversity conservation and sustainable management of living natural resources.	<ul style="list-style-type: none"> <li>Legislative Requirement</li> <li>EBRD PR 6</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date.</li> <li>On-going throughout the Construction Phase.</li> </ul>	<ul style="list-style-type: none"> <li>Develop a robust baseline database of flora, fauna and habitat, sufficient to allow evaluations of Project impacts on key receptors.</li> <li>Reports to Authorities as required by the Project Authorisation (Permits &amp; Environmental Permits).</li> <li>Report to the MLAs on Monitoring Programme status and schedules.</li> </ul>
6.3	Develop a Displacement Rescue Plan for the protected fish population [i.e. Tropicophoxinellus Spartiacicus and Anguilla Anguilla] in the areas affected by the Construction of the Dam and downstream of Minagiotiko stream (location: 8km+100m), prior to the commencement of the Construction Works. <i>Relevant Approved Environmental Terms - Clause 5.3.6.5</i>	Ensure effective biodiversity conservation and sustainable management of living natural resources.	<ul style="list-style-type: none"> <li>Legislative Requirement</li> <li>EBRD PR 6</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date.</li> <li>On-going throughout the Construction Phase.</li> </ul>	<ul style="list-style-type: none"> <li>Avoid local extinction of the fish population located in the areas affected by the construction of the Dam and downstream of Minagiotiko stream [location 8km+100m].</li> </ul>
6.4	<ul style="list-style-type: none"> <li>Develop and implement a Rehabilitation Plan for the areas of the Project affected by the construction works, including erosion control, regrading as needed, topsoil replacement, revegetation with native species, etc.</li> <li>Establish a robust Monitoring Plan to ascertain effective protection of critical habitat.</li> </ul>	Ensure effective biodiversity conservation and sustainable management of living natural resources.	<ul style="list-style-type: none"> <li>Legislative Requirement</li> <li>EBRD PR 6</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date.</li> <li>On-going throughout the Construction Phase.</li> </ul>	Maximise land restoration and minimise erosion and other impacts during the Construction Phase.
6.5	<ul style="list-style-type: none"> <li>Develop a Biodeversity Action Plan, as defined in the Approval Decision of the Environmental Terms of the PPP.</li> <li>Establish a Policy and ascertain that the Employees / Workers aren't violating any applicable protecting rules for the protection of the Biodiversity.</li> </ul>	Ensure effective biodiversity conservation and sustainable management of living natural resources.	<ul style="list-style-type: none"> <li>Legislative Requirement</li> <li>EBRD PR 6</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> <li>O&amp;M Contractor</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date.</li> <li>On-going throughout the Construction and Operation Phases.</li> </ul>	Ascertain no violations of applicable protecting rules.
<b>EBRD Performance Requirement 7: Indigenous Peoples</b>						
7.1	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
<b>EBRD Performance Requirement 8: Cultural Heritage</b>						
8.1	Develop a Chance Find Procedure (CFP) [reveal of Antiquities during Works] and ascertain implementation by the DCC Contractor throughout the Construction Period.	Minimise risk of impacts on cultural heritage.	<ul style="list-style-type: none"> <li>Legislative Requirement</li> <li>EBRD PR 8</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date.</li> </ul>	<ul style="list-style-type: none"> <li>Report to Authorities in case of Antiquities' finds.</li> <li>Report to the MLAs on development of procedure, evidence and Antiquities' finds.</li> </ul>
<b>EBRD Performance Requirement 9: Financial Intermediaries</b>						
9.1	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
<b>EBRD Performance Requirement 10: Information Disclosure and Stakeholder Engagement</b>						
10.1	<ul style="list-style-type: none"> <li>Implement Stakeholder Engagement Plan (SEP) which includes project level stakeholder grievance mechanism and notice to the Authorities of major construction and operation events.</li> <li>Monitor effectiveness of SEP implementation.</li> </ul>	Ensure effective stakeholder engagement and maintain good community relations.	<ul style="list-style-type: none"> <li>EBRD PR 10</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> <li>O&amp;M Contractor</li> </ul>	<ul style="list-style-type: none"> <li>By the Construction Works Commencement Date.</li> <li>On-going throughout the Construction and Operation Phases.</li> </ul>	<ul style="list-style-type: none"> <li>SEP approved and signed-off by the Interested Parties.</li> <li>Regular community meeting minutes and notifications available to the MLAs.</li> <li>Minutes of public consultation on Environmental and Social Studies and Management Plans.</li> <li>Records of engagement with Non-Governmental Organisation (NGOs) and local Stakeholders.</li> </ul>
10.2	Develop a Project external Communication Plan.	Ensure effective stakeholder engagement and maintain good community relations.	<ul style="list-style-type: none"> <li>EBRD PR 10</li> <li>Best Practice</li> </ul>	SPV	By the Construction Works Commencement Date.	Communication Plan.
10.3	<ul style="list-style-type: none"> <li>Develop and maintain an effective Community Grievance Mechanism.</li> <li>Regular review (annual) of the effectiveness of the existing Community Grievance Mechanism and revision if needed.</li> </ul>	Ensure effective stakeholder engagement and maintain good community relations.	<ul style="list-style-type: none"> <li>EBRD PR 10</li> <li>Best Practice</li> </ul>	<ul style="list-style-type: none"> <li>SPV</li> <li>DCC Contractor</li> <li>O&amp;M Contractor</li> </ul>	<ul style="list-style-type: none"> <li>On-going throughout the Construction and Operation Phases.</li> <li>Quarterly Reports during Construction Phase and Semi-Annual Reports during Operation Phase.</li> </ul>	<ul style="list-style-type: none"> <li>Record of Grievance Resolution Committees meetings.</li> <li>Grievance database maintained.</li> <li>Periodic reports on Grievance management are available and contain agreed information.</li> <li>Annual public awareness campaigns on Project's Safety.</li> </ul>



No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, Policy, Good Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
10.4	Maintain access of documents related to Environmental and Social aspects to the Public.	Ensure effective stakeholder engagement and maintain good community relations.	<ul style="list-style-type: none"><li>EBRD PR 10</li><li>Best Practice</li></ul>	SPV	<ul style="list-style-type: none"><li>On-going throughout Project lifetime.</li></ul>	<ul style="list-style-type: none"><li>ESIA, Environmental Terms Approval Decision (in Greek "ΑΕΠΟ") and other relevant documents available online on a website developed and maintained by the SPV.</li></ul>

Legend: It is clarified that the subject Environmental and Social Action Plan is based on and reflects (a) the Approved Environmental Terms of the PPP (Ref. No. ΥΠΕΝ/ΔΙΠΑ/37919/2484 - 24/04/2019 [ΑΔΑ: 6ΡΔΧ4653Π8-Λ15]), (b) the Environmental and Social Impact Assessment, (c) EBRD Performance Requirements as defined in the EBRD's Environmental and Social Policy and (d) Best Practises applied in the PPP Environment and Construction Industry.