REPORT

Khorezm Solar Project

Soil, Drainage and Erosion Control Management Plan (SoilMP) - Construction Phase

Submitted to:

Gregory Shaw
Voltalia

E&S Regional Officer
Europe & Africa Development
84, boulevard de Sebastopol
75 003 Paris, France

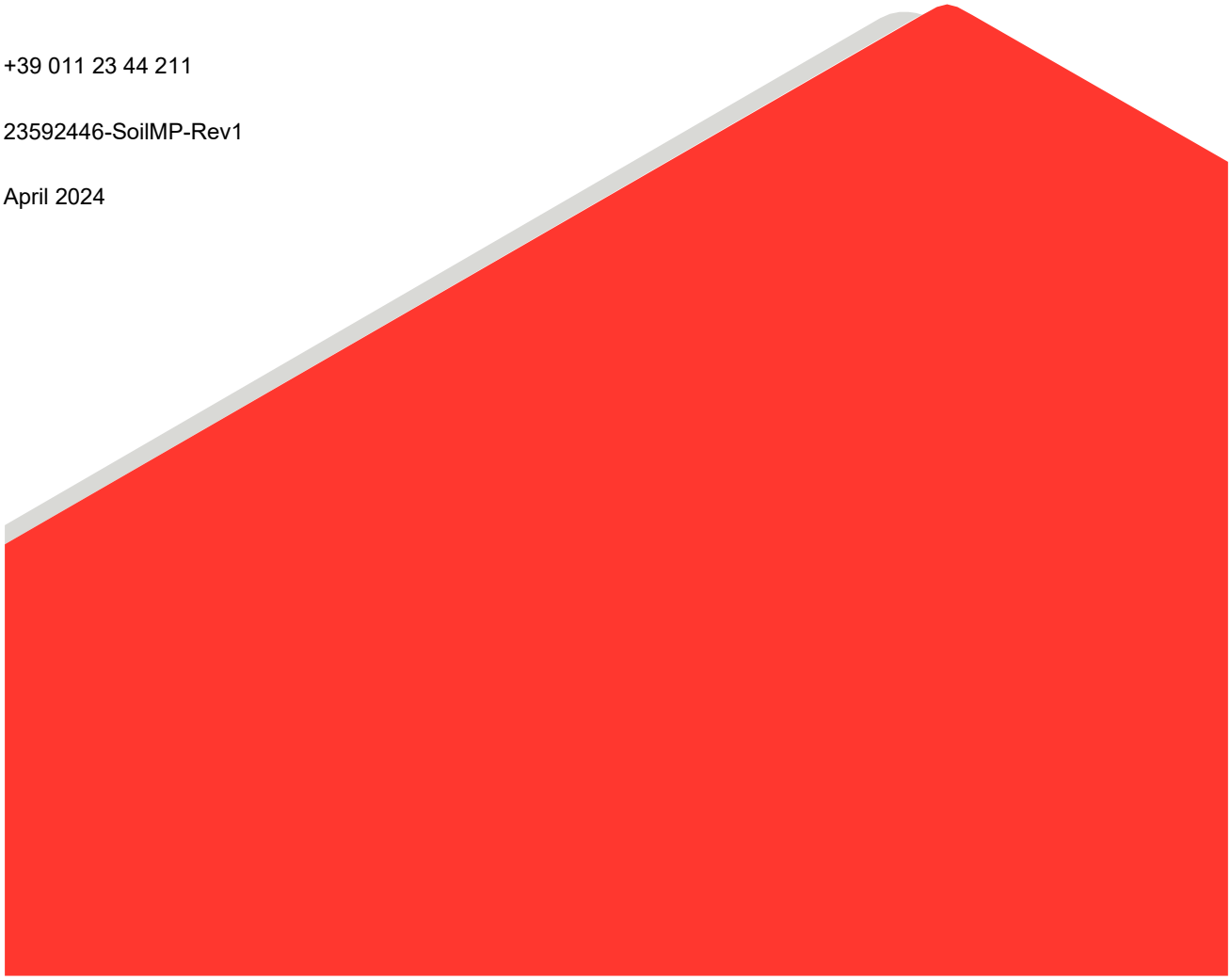
Submitted by:

WSP Italia S.r.l.
Via Antonio Banfo 43, 10155 Torino, Italia

+39 011 23 44 211

23592446-SoilMP-Rev1

April 2024



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Company	Client Contact	Version	Date Issued	Method of Delivery

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Acronyms and Abbreviations

AQMP	Air Quality Management Plan
BMP	Biodiversity Management Plan
CSSMP	Community Health, Safety and Security Management Plan
DCM	Decree of Cabinet of Ministers
EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health and Safety
EPRP	Emergency, Preparedness & Response Plan
EPC	Engineering, Procurement and Construction
EPRP	Emergency, Preparedness & Response Plan
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
GIIP	Good International Industry Practice
H&S	Health and Safety
IASMP	Invasive Alien Species Management Plan
ID	Identification code
IFC	International Finance Corporation
KPI	Key Performance Indicator
MP	Management Plan
MW	Megawatt
Obs.	Observed
OHSMP	Occupational, Health and Safety Management Plan
OTL	Overhead Transmission Line
PPA	Power Purchase Agreement
PPE	Protective Personal Equipment
PPP	Public-Private Partnership
PR	EBRD Performance Requirements
Project	Khorezm Solar Project
PS	IFC Performance Standards

PV	Photovoltaic
Ruz	Republic of Uzbekistan
SCEEP	State Committee on Ecology and Environmental Protection
SoilMP	Soil, Drainage and Erosion Control Management Plan
SPPP	Solar Photovoltaic Power Plant
WBG	World Bank Group
WMP	Wastewater Management Plan
WHMMP	Waste and Hazardous Materials Management Plan

1.0 INTRODUCTION

This document is the Soil, Drainage and Erosion Control Management Plan (SoilMP) for the Khorezm Solar PV Project (the Project) – construction phase and it identifies and presents the framework and the strategy for managing Project's E&S impacts and risks associated to the aspects related to soil, drainage and erosion control. This Plan sets the principles according to which soil, drainage and erosion control management will be performed for the Project and presents a plan of activities to be carried out throughout the Project's construction phase. This Plan has been developed in accordance with the applicable requirements, including the Uzbek regulatory framework, International Finance Corporation (IFC) Performance Standards (PSs), EBRD Performance Requirements (PRs) and World Bank Group (WBG) General Environmental, Health and Safety (EHS) Guidelines.

1.1 Purpose, Scope and Applicability

The main objective of this document is to develop and implement plans and procedures to integrate environmental, health, safety and social aspects related to soil, drainage and erosion control management within the overall Project management framework throughout the Project construction phase.

This document also provides guidelines to the Engineering Procurement and Construction (EPC) Contractor and also sub-contractors to address soil, drainage and erosion control management according to the standards mentioned above (Uzbek regulatory framework, IFC PSs, EBRD PRs and WBG General EHS Guidelines).

The Scope of this Plan includes:

- The definition of Project standards related to soil, drainage and erosion control management during the construction phase;
- The definition of responsibilities, commitments, operating procedures and instructions for the implementation of this Plan;
- The identification of adequate mitigation measures applicable to the Project in relation to soil, drainage and erosion control management. A mitigation hierarchy will be adopted to anticipate and avoid, or where avoidance is not possible, minimize and restore impacts on the environment;
- The establishment of a monitoring program to assess the effects of residual impacts on the environment;
- The identification of actions to measure the performance of monitoring activities;
- The establishment of a guideline to report the results of monitoring and periodic audits and provide for corrective actions as necessary, in order to achieve the planned objectives.

This Plan applies to all Voltalia normal and expected construction activities related to the Project and does not specifically address any emergency situations. Emergencies, their procedures, their reporting, and the coordination with local emergency services are addressed in the Emergency Preparedness & Response Plan (EPRP). This Plan provides requirements and guidance for Contractors and Sub-Contractors involved in the construction activities of the Project, including all secondary and associated facilities, whether temporary or permanent, including the workers camp, if applicable. No construction activities shall commence until approval of this Plan.

This section shall be read in conjunction with the management plans identified below.

1.2 Relationship with other Management Plans

The Soil MP is to be read in conjunction with the following management plans:

- Air Quality Management Plan (AQMP);

- Waste and Hazardous Materials Management Plan (WHMMP);
- Wastewater Management Plan (WMP);
- Water and Energy Sources Management Plan (WEMP);
- Emergency, Preparedness & Response Plan (EPRP);
- Biodiversity Management Plan (BMP); and
- Invasive Alien Species Management Plan (IASMP).

1.3 Project Overview

The Khorezm Solar PV Project (the Project) consists in the development of:

- A 100 MW solar photovoltaic power plant (SPPP) and a step-up 35/220 kV substation. Approximately 200.000 pieces of solar panels will be installed, with an average power of 675 watts per panel.
- An associated 3.2 km overhead 220kV transmission line that will connect the SPPP to the existing Sarimay substation location north-west of the project; and
- the construction of two additional extension bays for the existing Sarimay substation to allow for the additional incoming capacity to be generated by the SPPP.

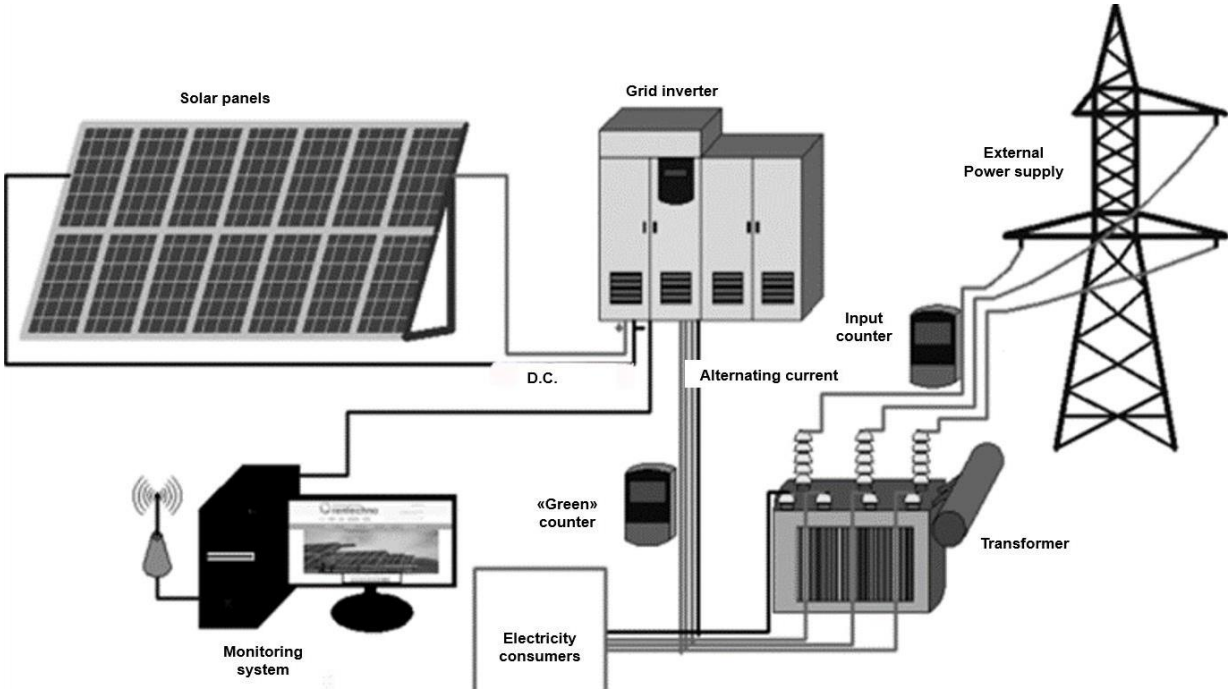
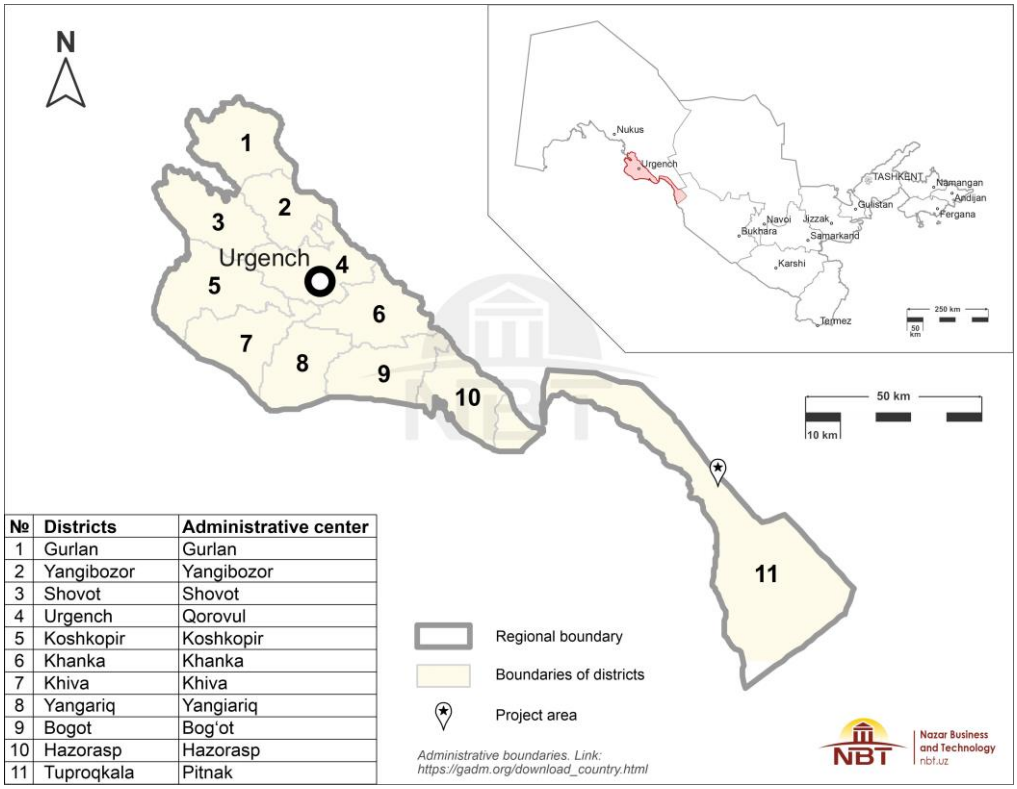


Figure 1: Schematic diagram of a solar photovoltaic power plant operation

The Project will be carried out in the Tuprokkala district in the Khorezm region of Uzbekistan, located 120 km south-east of Urgench city, close to the border with Turkmenistan and near the Amu-Darya River. The limits of the Khorezm region and the approximate location of the Project are observed in Figure 2.



№	Districts	Administrative center
1	Gurlan	Gurlan
2	Yangibozor	Yangibozor
3	Shovot	Shovot
4	Urgench	Qorovul
5	Koshkopir	Koshkopir
6	Khanka	Khanka
7	Khiva	Khiva
8	Yangariq	Yangiariq
9	Bogot	Bog'ot
10	Hazorasp	Hazorasp
11	Tuproqkala	Pitnak

Figure 2: Project Region. Source: NBT, 2023.

The Project is being implemented as part of a Public-Private Partnership (PPP) between the Government of the Republic of Uzbekistan represented by the Ministry of Energy (the Project Proponent), and FE LLC Sarimay Solar, an entity created in Uzbekistan by Voltalia S.A. (the Project Developer) for the purpose of this Project. The selection process for the EPC Contractor is currently ongoing (as per the release date of this document).

The Project covers approximately 177 hectares which will be utilized entirely for the construction and installation the solar photovoltaic power plant. The Sarimay Switching Station (SS) can be found at 3 km north-east of the Project site, which will receive the Project's produced energy. The two nearest settlements are the two villages of Sarimay and Nukus. The Project layout and some characteristics of its surroundings, such as communities and infrastructure are shown in Figure 3 below.

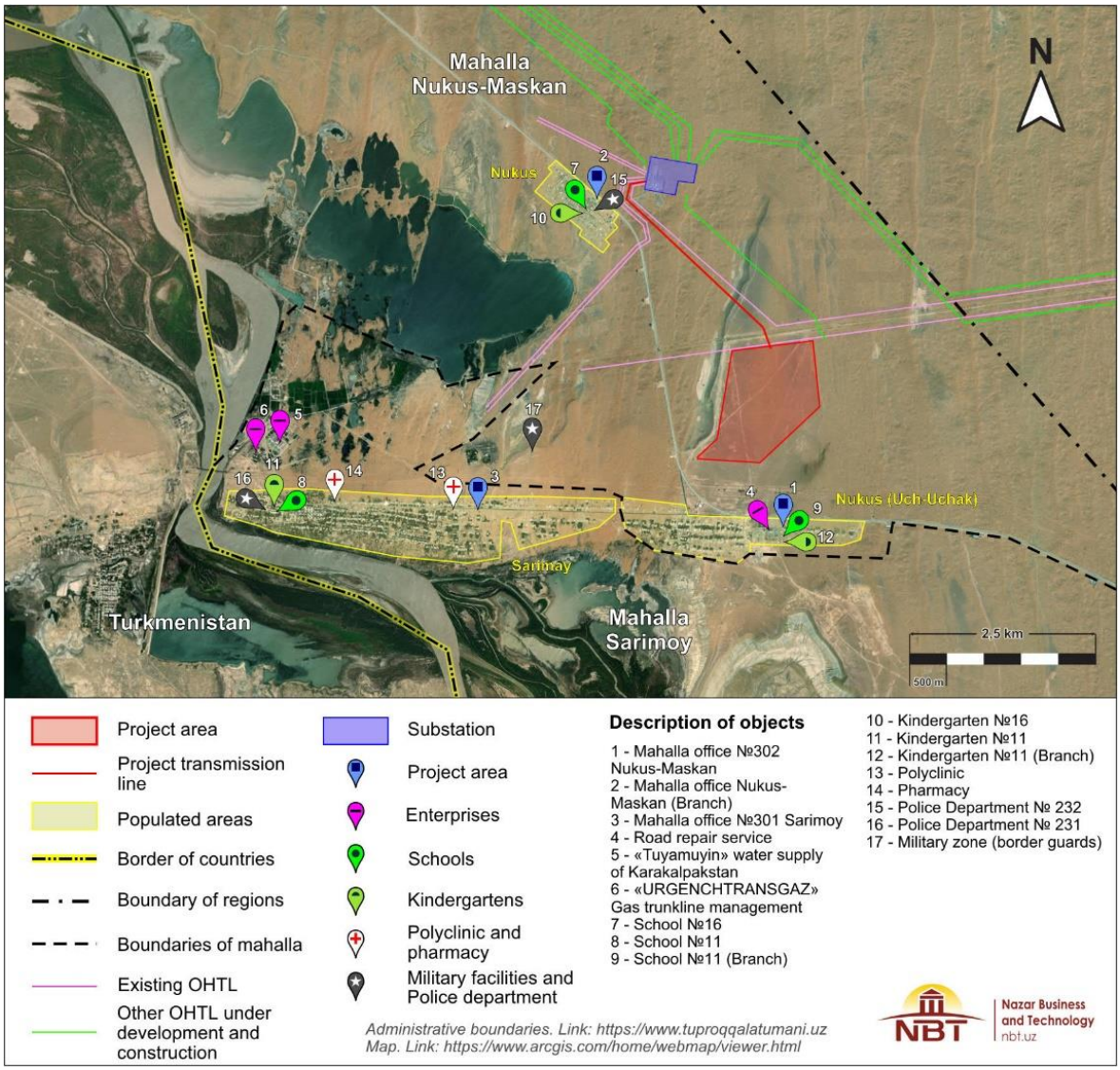


Figure 3: Project area and surroundings. Source: NBT, 2023.

The estimated construction time of the Project will be 1 year and the estimated total workforce required during the peak construction period is estimated to be between 200-250 workers, including technician and low-skilled personnel.

Initial activities, including site preparation, will entail several activities, which can occur simultaneously in different areas. Some examples include:

- Site works preparation and accommodation;
- Unloading/loading equipment;
- Mobilization of vehicles, workers and equipment, materials transportation;
- Vegetation clearing and land stripping;
- Earthworks (excavations, landfill, surface levelling/grading);
- Adaptation of existing roads and implementation of temporary construction roads;

- Installation of lifting cranes and warehouses for storage of delivered power equipment and building materials;
- Concrete pouring under the foundation of buildings and structures;
- Buildings and structures mounting;
- Mechanical and electrical works;
- Performance tests;
- Building of sewage septic tank and firefighting water tank;
- Site clean-up and demobilization activities, among others.

The operation lifecycle is considered to be approximately 25 years. The workforce during operation is expected to be around 20 and will include skilled technician, security guards, and support staff.

During the operation these modules will need to be cleaned periodically depending on soiling and sand/silt accumulation. A preventative maintenance program will be established for maintenance of the inverters, mounting structures, surge arresters, cables and PV junction boxes, meteorological station, security, fencing and gates, ditches and drainage culverts as well as all sub-station components including services and septic tank. Scheduled regular maintenance will be carried out by the National Electric Grid of Uzbekistan (NEGU).

On the other hand, the OTL will be designed for continued operability (24 hours per day, 7 days per week) depending on the regime and parameters of the national and regional power transmission grid. From the beginning of the operations, the transmission line will work without the continuous presence of personnel.

1.3.1 Project Soil, Drainage and Erosion Aspects

For the construction and installation of all project components, site activities such as vegetation clearance, earthworks and excavations will take place and may have adverse impacts on soil in several ways by:

- covering soil with impermeable materials, effectively sealing it and resulting in significant detrimental impacts on soils' physical, chemical and biological properties, including drainage characteristics;
- contaminating soil as a result of accidental spillage or the use of chemicals;
- over-compacting soil through the use of heavy machinery or the storage of construction materials;
- reducing soil quality, for example by mixing topsoil with subsoil; and
- wasting soil by mixing it with construction waste or contaminated materials, which then must be treated before reuse or even disposed of at landfill as a last resort.

The degradation of soil can weaken its structure and change its texture. Textural changes can in turn affect the water-holding capacity of the soil, making it more susceptible to extreme conditions such as drought. This may also trigger or enhance sheet erosion phenomena.

The landscape alteration by the removal of vegetative cover may contribute to accelerated erosion, since vegetation and roots systems have an essential role in maintaining the balance of natural landscape processes (natural erosion and soil formation). The removal of vegetation will lead to exposure of the soil layer, which may alter rainwater infiltration patterns and rate, change soil texture and moisture content.

It is expected that 139 m^3 of topsoil and vegetation will be removed for the Project. According to information provided, the topsoil will be put aside and kept for re-use during construction whenever viable.

2.0 REFERENCE & LEGAL REQUIREMENTS

This section includes the policies, standards, and requirements of reference for this Plan that are applicable for the construction phase of the Project.

Project standards are described in detail the Project ESIA Section 02 – Regulatory Framework and are listed below:

- Relevant national legislative requirements;
- IFC Performance Standards;
- EBRD Performance Requirements;
- World Bank Group EHS Guidelines;
- Good International Industry Practices; and
- Voltalia's policies, related practices, and procedures.

The Project is expected to achieve whichever is more stringent amongst these. The relevant international standards shall be also directly applicable in the absence of applicable Uzbek standards.

2.1 National Requirements

The relevant Uzbek laws, resolutions (decrees) and sanitarian norms related to soil management include:

Laws:

- Law No. ZRU-903 on "Soil Protection and Increasing their Fertility", dated 02.02.2024 (with effective date 04.05.2024), which establishes state control in the field of soil protection and increasing their fertility, the rights and obligations of landowners, land users and land tenants in the field of soil protection and increasing their fertility. The Law also reflects the right to demand compensation from individuals and legal entities for damage caused to the soil is established. The use of equipment that compacts the soil is prohibited.

Resolutions (Decrees):

- Decree of Cabinet of Ministers (DCM) No. 255 of 31.03.2018 "On approval of some administrative regulations of state services in the sphere of nature management", which establishes the procedure for issuing permits for cutting trees and shrubs that are not included in the state forestry fund, to legal entities and individuals;
- DCM No. 43 of 17.01.2019 "On measures to further improve the procedure for streamlining the use of trees and shrubs not included in the state forest fund, as well as the issuance of permits in their use" which establishes the amounts of fees for cutting trees and shrubs not included in the state forestry fund. However, it states that cutting of trees and shrubs, during construction works financed from the state budget, loans and grants of foreign and international organizations or investments of international financial institutions, as well as to perform activities established by decrees and orders of the President and the government of RUz are made on the basis of conclusion of the Ministry of Ecology, Environmental Protection and Climate change of Republic of Uzbekistan and permit issued by local public administration and are exempt from the established fees as an exception.

Sanitarian norms:

- SanR&N No 0212-06 - Hygienic assessment of the degree of soil pollution of different types of land use under specific conditions of Uzbekistan;

- SanR&N No 0183-05 - Hygienic requirements for the quality of the soil in settlements areas in specific natural and climatic conditions of Uzbekistan;
- SanPiN No 0272-09 - Sanitary rules and norms for compiling hygienic justifications for soil protection schemes from pollution in Uzbekistan";
- SanPiN No 0191-05 - Maximum permissible concentrations (MPC) and Approximate allowable concentrations (AAC) of exogenous harmful substances in soil. These standards have been considered in Section 02 of the ESIA (Regulatory Framework).

2.2 International Standards

The Project is required to meet requirements of international lending financing institutions, specifically:

i) The International Finance Corporation (IFC) Performance Standards (PS) 2012 and relevant Guidance Notes (GN), in particular:

   a. IFC PS3 and IFC GN3 – Resource Efficiency and Pollution Prevention, which includes soil pollution prevention which outlines a project-level approach to resource efficiency and pollution prevention and control in line with internationally disseminated technologies and practices. In addition, this Performance Standard promotes the ability of private sector companies to adopt such technologies and practices as far as their use is feasible in the context of a project that relies on commercially available skills and resources.

ii) EBRD Performance Standards (PR) (2019), in particular:

   b. PR 3 and Guidance Note on Resource Efficiency and Pollution Prevention and Control, which establishes general requirements with regards to soil management (contaminated land).

ii) World Bank IFC General and Sector-Specific EHS Guidelines, more specifically:

   c. Section 1.8 – Contaminated Land, which provides a summary of management approaches for land contamination due to anthropogenic releases of hazardous materials, wastes, or oil, including naturally occurring substances;

   d. Section 4.0 – Construction and Decommissioning, which provides mitigation measures for soil erosion management approaches;

   e. Industry Sector Guideline “Electric Transmission and Distribution”, which addresses soil erosion and sediment control from materials sourcing areas and site preparation activities.

2.3 Necessary Permits and Approvals

The following permits related to soil management are necessary for the Project construction activities:

The necessary permits for removal, cutting and transplant of trees and shrubs will be obtained from the relevant authorities before the start of construction works, in accordance with the DCM No. 43 dated 17.01.2019 and the DCM No. 255 dated 31.03.2008, both listed in section 2.1 above. The permits will be issued by the Ministry of Ecology.

Whenever the removal of trees and shrubs is necessary, measures should be taken to transplant trees and shrubs to another place taking into account the conditions of their rooting. A nationwide program "Yashil Makon" is being implemented and there is an indefinite moratorium on felling of valuable tree species not included in the state forest fund (Presidential Decree #UP-81 dated 31.05.2023). The Biodiversity Management Plan (BMP) will provide a strategy compliant with the Uzbek legislation for the management/relocation of *haloxylon sp.* within the Project's footprint.

In addition, Project organizers are required to comply with the requirements of Law No. ZRU-903 for removing and preserving the fertile layer. In case of violation, they are obliged to compensate the damage to the local budget. The funds received will be used to put unused irrigated lands into circulation and to improve the reclamation condition.

3.0 ROLES AND RESPONSIBILITIES

Voltalia is responsible for ensuring that the measures set out in this Plan are implemented in full and this will be achieved by verifying the compliance of the EPC contractor and subcontractors.

General roles and responsibilities for the implementation of this Plan are provided in Table 1. The roles and responsibilities for the implementation of this management plan will be revised according to the any changes in Voltalia's organisational structure.

The EPC Contractor is not yet defined. Their specific responsibilities described in the table will be properly distributed once their organisational structure is known.

Table 1: Roles and Responsibilities.

Role	Responsibilities
Voltalia SPV	
Project Director	■ Ensure the Voltalia's HSES Policy and HSES Management System Requirements are in line with EBRD performance requirements, and IFC Performance standards, and ESAP requirements and are communicated and implemented effectively and consistently to the Project's relevant stakeholders; ■ Ensure the HR policy includes a code of conduct, provisions regarding forced labour and illegal employment, and must explicitly require that all construction staff and workers receive a written contract with the HR policy prior to starting work and in its own language; ■ Allow sufficient time and adequate resources for the implementation of this Plans requirements; ■ Foster HSES leadership culture within the Project: and ■ Assign an ESAP owner conversant with EBRD Performance Requirements and Uzbek legislation.
Health & Safety Site Supervisor	■ Supervise workers within their area of supervision, take corrective action when HSES issues are noted and report these issues to the Site Management Team; ■ Participate in internal audits and investigation of incidents to determine root cause and corrective actions; ■ Supervise close out H&S incident reports and record, monitor and follow up close out of action items in the Action Tracking System. ■ Liaise with Site Managers on relevant H&S issues and organize H&S meetings; ■ Perform regular site and work front visits and inspections and monitor High Risk Activities;

Role	Responsibilities
	■ Develop, review, and approve risk assessments, RAMS and PTW´s. Ensure liaison with other relevant HSES Site Management Team members in this process to collect their feedback concerning their respective fields of actuation; ■ Liaise with the Lenders on Project E&S performance, to seek alignment between their expectations; ■ Review and approve site access HSE documentation; ■ Overseeing, managing, and allocating adequate resources for the implementation of the HSES Management System.
E&S advisor	■ Oversee this Plan; ■ Ensure that all the environmental authorizations and permits have been obtained in a timely manner; ■ Monitor close out of environmental action items in the Action Tracking System; ■ Review the Environmental management documents; ■ Ensure all corrective/preventive actions related to environmental risks and incidents are implemented; ■ Liaise with Site Managers on relevant Environmental issues and plan environmental performance monitoring meetings; ■ Supervise and manage the work of the Environmental specialists; ■ Review Environmental incident reports; ■ Perform regular site and work front visits and inspections and monitor high environmental risk activities and the commencement of activities in new areas or areas with significant environmental sensitivities; ■ Ensure implementation of the Project's Management Plans in accordance with environmental permit requirements and ESIA requirements if different; ■ Ensure the social components of the Project are compliant with this Plan, permit requirements, local legislation, and Lenders' requirements; ■ Ensure that stakeholder engagement during construction is in line with Lender's requirements and national regulations; ■ Supervise the work of the Community Liaison Officer and ensure the correct implementation of the stakeholder engagement plan and grievance mechanism; ■ Ensure the implementation of the community health and safety management measures; ■ In coordination with HR Coordinator, verify that all social measures from LMP are implemented on site;

Role	Responsibilities
	■ Report to the Lenders on (i) Implementation status of the ESAP and of the Register of commitments, with success/fail indicators (see ESAP action 1.4) and (ii) the Environmental and social performance of the project activities, and (iii) the management of non-compliances and corrective actions; and Final approval of this Plan and subcontractors' plans/procedures prior to their implementation.
Voltalia - Site Manager	■ Day to day supervision of the site; ■ Supervision of Project execution timeline and its disclosure to the Site Management Team; ■ Ensure compliance of requirements by Contractor at the different phases of the Project (pre-qualification reports, kick off meetings, periodic performance evaluations...); ■ Supervise dissemination of the updated version of this Plan to all Site workers, including the EPC Contractor and Subcontractors; ■ Supervision of this Plan's requirements implementation through regular site monitoring visits and EPC Contractor and Subcontractors documentation/reports review; ■ Supervision of adoption and implementation of disciplinary actions upon failure to comply with requirements; ■ Supervision that all workers have proper training to implement the requirements of this Plan; ■ Participation and supervision in the worksite Risk Management process (risk assessment, RAMS, PTW, interface management, definition of control measures, and change management); and ■ Ensure contractors and service providers compliance with EBRD 2019 PRs and IFC 2012 PSs by including them in the list of applicable E&S requirements to be complied with. Require them, in a legally binding manner, to cascade the requirement down their subcontractors' chain.
HSE Coordinator	■ Implementation of the HSE Policies, Sustainability principles, procedures and best practices, transversely to Voltalia region; ■ Keeping up-to-date with any changes in safety regulations and standards; ■ Monitor and ensure that the Projects' E&S objectives are achieved; ■ Ensure the Projects' E&S requirements and this Plan are communicated to, and implemented by the Projects' personnel, including the Site Management Team and Contractors; ■ Prepare a register of all E&S commitments from the permitted EIA, ESIA and ESAP actions;

Role	Responsibilities
EPC Contractor - Site Management Team	
Project Manager	■ Overall delivery of the Project and HSES performance, and assurance of compliance with budget, schedule, project policies, plans and procedures; ■ Ensure that the necessary resources, authority, information, are provided to enable the execution of Project's HSES management activities and HSES procedures; ■ Ensure that HSES management issues are included in periodic reports to be to be sent to Site Management Team, and also in reports prepared by Site Management Team to be sent to the Project Owner; ■ Submit periodic reports to the Project Owner. ■ Cooperate with Project Owner to obtain necessary permits and/or legal documents for the Project, if necessary. Hold a dedicated register of these permits and authorizations, indicating their scope and validity date if any.; ■ Supervision of the proper implementation of this Plan by the Site Management Team and subcontractors' plans/procedures prior to their implementation through regular meetings and review of reports; ■ Designating specific personnel on site or at the administrative level for the implementation of the E&S Management System; ■ Present monitoring data to Voltalia's Corporate Level and to the Lender; ■ Liaise with the Project Owner, corporate level HSES team, for implementation of this Plan; and ■ Follow-up on any grievances and non-Conformities, non-compliance or deviation from the requirements of this Plan.
Site Manager	■ Ensure that all the activities of the Project are carried out in accordance with this Plan and implement control measures and procedures that have been issued by Site HSES Management Team and the Project Owner as per the HSES Management Plan; ■ Ensure that the international E&S requirements applicable to the Project are included - as conditions - in contracts with Subcontractors and suppliers; ■ Instruct and/or train workers on the requirements of this Plan; ■ Ensure that Personal Protective Equipment is always available on site and is used whenever required; ■ Deliver all the documents required for contractors' validation as per the requirements of this Plan and the Voltalia HSES Management Plan;

Role	Responsibilities
	■ Provide to Voltalia's Health and Safety Site Supervisor, before the start of any hazardous work, the Environmental Risk Assessment and Method Statement – RAMS; ■ Identify the need for specialized Subcontractors to carry out specific tasks on site in compliance with this Plan provisions; ■ Coordinate with Voltalia's HSE Manager, organize and participate in the auditing activities organization, maintain a program of audits and inspections at the Construction Site; ■ Ensure that the raised non-conformities based of this Plan are addressed and resolved as quickly as possible; ■ Ensure the planning, preparation and provision of the trainings in order to enable the full implementation of the Plan; ■ Check the E&S performance of all Subcontractors in relation to this Plan implementation; ■ Verify the compliance with the contractual arrangements and with the Project standards and requirements; ■ Provide the monitoring reports to Voltalia's Site Management Team through the monthly report; ■ Liaise with Voltalia's HSE Manager for proposing and discussing – where necessary – potential changes and integrations of the monitoring activities of this Plan; ■ Report and resolve the non-conformities raised; ■ Notify and report to the Site Manager any Near Misses, hazardous conditions and incidents during construction activities; ■ Perform the Contractor Management process (pre-qualification reports, kick off meetings, periodic performance evaluations...); and ■ Ensure that all plant machinery and equipment are suitable for the use allocated to them and maintained in good working order, and record related maintenance activities.
HSES Manager	■ Organizing and delivering the implementation of all the Health, Safety and Environment obligations, also for subcontractors, as per the EPC contract, the ESAP, the Environmental Permit and the Uzbek Environmental, Social, Health and Safety legislation; ■ Be conversant with EBRD PRs, IFC PSs and the Uzbek E&S legislation; ■ Oversee performance and ensure compliance of the Project with requirements of this Plan through regular meetings with the E&S Site Management Team and review of E&S reports;

Role	Responsibilities
	■ Ensure that sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of actions, measures and monitoring activities; ■ Ensure ESMS is in-line with the Project ESMS; ■ Collecting, organizing and reviewing monitoring data and performance monitoring reports provided by the HSE specialist(s) and providing summary results of such reports to the Project Manager; ■ Bringing Non-Conformities immediately to the attention of the Project Manager and ensuring that action/measures and monitoring activities are carried out timely and adequately according to this Plan requirements; ■ Programming inspections and audit activities to monitor the correct implementation of this Plan and of HSE specialist(s) tasks; ■ Monitor the compliance of the activities by Site Team, and subcontractors, with the time schedule and conducting regular inspections and audits of the soil management activities to identify any non-conformances; ■ Addressing Non-Conformities through the definition of Preventive/Corrective actions proposing to the Project Manager, if necessary, amendments and/or updates to this Plan and issuing Plan revisions; ■ Search for continuous improvement through audits and monitoring of the HSE KPIs and internal processes; ■ Advise and support the Project Manager and Site Manager on matters related to HSES; ■ Develop HSES training and induction schedules and content and deliver the training and induction material such as site induction and toolbox talks; and ■ Review and approve H&S Management documents delivered by the Health & Safety Site Supervisor.
Health & Safety Site Supervisor	■ Communicate and instruct workers in proper work practices and update instructions as needed, make records of this instruction; ■ Supervise workers within their area, take corrective action when HSES issues are noted and report these issues to the Site Management Team; ■ Participate in internal audits and investigation of incidents to determine root cause and corrective actions; ■ Develop and update the Project specific H&S management documents; ■ Communicate the Health and Safety (H&S) requirements to Project personnel including Site Manager;

Role	Responsibilities
	■ Develop, review, investigate and close out H&S incident reports and record, monitor and follow up close out of action items in the Action Tracking System. ■ Contact point for reporting H&S Near Misses, hazardous conditions, and incidents onsite and takes care of reporting to the Project Manager and the HSE Manager; ■ Liaise with Site Managers on relevant H&S issues and organize H&S meetings; ■ Deliver the H&S component of training and induction such as site induction and toolbox talks; ■ Perform regular site and work front visits and inspections and monitor High Risk Activities; ■ Develop, review, and approve risk assessments, RAMS and PTW´s. Ensure liaison with other relevant HSES Site Management Team members in this process to collect their feedback concerning their respective fields of actuation; and ■ Review and approve site access HSE documentation.
E&S specialist	■ Obtain all E&S authorizations and permits in a timely manner; ■ Record and follow up close out of E&S action items in the Action Tracking System; ■ Develop and update E&S management documents; ■ Report and investigate all E&S risks and incidents to the HSES Manager and Site Manager, and ensure all corrective/preventive actions related to environmental management are implemented; ■ Liaise with Site Managers on relevant Environmental issues and plan environmental performance monitoring meetings; ■ Develop Environmental incident reports; ■ Communicate the E&S requirements to Project personnel and perform necessary training; ■ Ensure that stakeholder engagement during construction is in line with Lender's requirements and national regulations; ■ In coordination with the HSE site supervisor, ensure the implementation of the community health and safety management measures; ■ Address external grievances through the Community Grievance Mechanism and ensure corrective action as per the mechanism; ■ Provide regular feedback in the form of progress report(s) (as needed) to the local authorities, specifically as it relates to local employment and economic development investment.

Role	Responsibilities
HR Coordinator	■ Conduct due diligence to assess and manage labour-related risks associated with the project; ■ Ensure compliance with the Project Labor Management Plan through audits, also for subcontractors; ■ Coordinate with the E&S Specialist and relevant governmental authorities to ensure legal compliance of subcontractors work conditions; ■ Conduct and analyse the workforce surveys as a monitoring tool; ■ Oversee that the recruitment processes are fair and transparent; ■ Ensure that workers are provided with clear and accurate information about their terms of employment, including wages, working hours, and benefits; ■ Oversee the implementation of policies to prevent discrimination in the workplace based on gender, ethnicity, nationality, or other factors, and to prevent and address child labour and forced labour; ■ Ensure that workers are paid fair wages in accordance with applicable laws and industry standards; ■ Monitor and enforce compliance with working hour limits to prevent excessive overtime; ■ Address internal grievances through the Community Grievance Mechanism and ensure corrective action as per the mechanism; ■ Ensure that workers have adequate rest periods and time off; ■ Oversee the communication and implementation of grievance mechanisms; ■ Build the capacity of Subcontractors to ensure effective labour management; ■ Collaborate with relevant stakeholders to promote positive impacts on local communities; ■ Put in place monthly random HR audits of its direct sub-contractors to verify the absence of illegal or non-compliant forms of employment. The results of audits shall be reported to Voltalia through quarterly E&S reports during construction; and ■ Ensure that all the staff employed on the construction site through his subcontractors chain is formally employed and declared, as required by the Uzbek legislation. Undertake during construction monthly random audits throughout his sub-contractors chain to verify compliance of the employment conditions with the provisions of the Uzbek labour legislation, EBRD PR2/IFC PS2 and the present ESAP. The results of these audits must be provided in the monthly E&S reports to Voltalia.

Role	Responsibilities
All workers	
All construction site workers	■ Comply with all HSE requirements; ■ Understand their responsibilities and implement the requirements of this Plan; ■ Participate in site induction training and other relevant HSES related training if required; ■ Report on any activities which demonstrate deviations from – or non-compliance with – this Plan requirements; and ■ Report any incidents, unsafe situation, or issues to their supervisors and stop work on the grounds of danger to life or the environment and report this immediately to the Site Manager.

For the complete list of HSES roles and responsibilities at a general project level, refer to the Voltalia HSES Plan.

4.0 MITIGATION MEASURES/ACTIONS AND MONITORING ACTIVITIES

The following table (Table 2) details the environmental management and mitigation measures/actions identified for soil, drainage and erosion control management related activities during construction phase. For each measure/action identified, the table shows:

- **Item:** identification code of the mitigation measure/actions (ID);
- **Measure/Actions:** description of the mitigation measure/actions;
- **Timeline and frequency:** frequency/timing of the measure/action;
- **KPI (Key Performance Indicator):** quantitative compliance indicator or qualitative acceptance criteria to be used to confirm the actual effectiveness of the mitigation measure/actions. KPIs are established to measure the effectiveness of the soil, drainage and erosion control management taking into consideration the local conditions and objectives. KPIs provide valuable feedback on implemented measures, helps to motivate managers and workers to undertake appropriate actions and are valuable for external communication purposes.
- **Target:** final qualitative or quantitative objective to comply with;
- **Verification Method**: internal audit or specific monitoring activity to verify the measure application; and
- **Responsibility:** responsible party in the organization for implementing both the mitigation measures/actions and monitoring activities;

Mitigation measures are defined and are presented in the table according to the “mitigation hierarchy” requiring that priority and preference are given to avoidance measures, while minimization and rehabilitation/restoration measures should be used only if avoidance is not possible, and offsets for impacts, only as the last resort. Moreover, the mitigations included in the table have been designed to be adaptive in response to the results of monitoring actions described in the last part of the table.

The aim of monitoring is to verify whether the residual impacts are under control and mitigation measures/actions are effective.

In case monitoring will demonstrate non-conformities or unexpected residual impacts, the HSE manager will evaluate the situation and, if needed, propose changes and integrations to the mitigation and monitoring activities included in the present SoilMP. The proposed changes will be evaluated and approved by the Voltalia's Project Manager who will also ensure that action/measures and monitoring activities are carried out timely and adequately.

Table 2: Mitigation measures/actions for construction phase.

Mitigation measure						Monitoring activities		
Item	**Mitigation Measures/Actions**	**Timeline and frequency**	**KPI**	**Target**	**Responsibility**	**Verification method**	**Frequency**	**Responsibility**
Soil-01	**<u>Minimization: MP dissemination and awareness</u>** ▪ The SoilMP will be disseminated to all staff involved in tasks related to soil management;	Pre-construction and during all period of construction phase	Records of SoilMP dissemination activities Percentage of SoilMP dissemination among relevant staff and workers.	All records available. 100% dissemination	EPC Contractor HSES Manager	**<u>Monitoring activities:</u>** ▪ Conduct periodical internal audits, to ensure that the plan is known by all relevant workers at all levels of the organization and implemented; ▪ Keep the records of the internal audits.	Quarterly during the entire construction phase and upon the hiring of any worker that will participate in soil and erosion control management activities.	EPC Contractor E&S Specialist
Soil-02	**<u>Minimization: employees' training</u>** ▪ All relevant personnel will be trained in proper soil management and reinstatement procedures, including soil contamination prevention and erosion control,	Pre-construction and during all period of construction phase	Percentage of relevant workers trained	100%	EPC Contractor HSES Manager	**<u>Monitoring activities:</u>** ▪ Verify that training courses and refreshment courses are completed; ▪ Keep on-site a detailed training register and records. They shall remain available for review.	Quarterly during the entire construction phase	EPC Contractor E&S Specialist

Mitigation measure						Monitoring activities		
Item	**Mitigation Measures/Actions**	**Timeline and frequency**	**KPI**	**Target**	**Responsibility**	**Verification method**	**Frequency**	**Responsibility**
	taking into consideration their level of responsibility and duties; ▪ Personnel at an appropriate level of seniority will be nominated to be responsible for good site practices and arrangements regarding soil management.							
Soil-03	**<u>Minimization: soil stripping, storage and placement</u>** ▪ The site will be prepared prior to construction to clearly identify the areas to be protected, haul roads, topsoil stripping areas and soil storage areas; ▪ Appropriated methods for soil	Pre-construction	Methods for topsoil stripping, storage and placement after construction are developed and implemented. Events in which	100% Zero.	EPC Contractor HSES Manager	**<u>Monitoring activities:</u>** ▪ Verify the methods for topsoil stripping, storage and placement are correctly implemented; ▪ Conduct one audit prior construction activities periodical internal audits to ensure that mitigation measures are being	Before construction activities start	EPC Contractor E&S Specialist

Mitigation measure						Monitoring activities		
Item	**Mitigation Measures/Actions**	**Timeline and frequency**	**KPI**	**Target**	**Responsibility**	**Verification method**	**Frequency**	**Responsibility**
	stripping, storage, and placement will be developed and implemented;		improper soil management methods are applied.			identified, implemented and monitored; ▪ Keep the records of the internal audits.		
Soil-04	**<u>Minimization: topsoil stripping and management</u>** ▪ The depth of the topsoil will be established; ▪ Only the strictly necessary amount of topsoil will be removed; ▪ The provisions of the BMP and the IASMP will be followed in relation to the removal of surface vegetation; ▪ If topsoil needs to be stockpiled for more than 3 months prior to placement, the stockpiles will be temporary	Pre-construction and during all period of construction phase	N.A.	100% of stripped topsoil is re-used onsite.	EPC Contractor HSES Manager	**<u>Monitoring activities:</u>** ▪ Periodic visual inspection of temporary stockpiles and check of control measures' application; ▪ Keep on-site forms, logs and registers with the amounts of stripped topsoil per month and the number of inspections completed; ▪ Conduct periodical internal audits to ensure that mitigation measures are being identified,	Monthly during the entire construction phase	EPC Contractor E&S Specialist

Mitigation measure						Monitoring activities		
Item	**Mitigation Measures/Actions**	**Timeline and frequency**	**KPI**	**Target**	**Responsibility**	**Verification method**	**Frequency**	**Responsibility**
	(preferably no longer than 6 months to avoid loss of quality), and will be covered with breathable material (geotextile fabric) to prevent soil loss and weeds infestation; ▪ Storage time within the stockpile shall be as short as possible less than 1 year and preferably less than 6 months; ▪ The topsoil will be re-used during construction activities whenever viable; ▪ Topsoil not re-used onsite will be properly managed and disposed by licensed waste operators.					implemented and monitored; ▪ Keep the records of the internal audits.		
Soil-05	**<u>Avoidance: Soil degradation</u>**	During all period of	Ratio between the	0:1	EPC Contractor HSES Manager	**<u>Monitoring activities:</u>**	Monthly during the entire	EPC Contractor E&S Specialist

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
	▪ The Project's footprint will be minimized by degrading only the strictly necessary soil portion and building only the strictly necessary buildings and facilities; The boundaries of the storage places and their setup will be defined depending on the local soil and vegetation vulnerability and on the type of materials or equipment; ▪ Layers (e.g., geotextiles, tarpaulins) and barriers for protecting the excavation fronts and surfaces from weathering will be placed; ▪ The excavated soil will be properly	construction phase	amounts of waste soil generated and the amounts of excavated soil Number of observations and nonconformities made regarding the proper management of the excavated soil / monthly	Zero observations / monthly		▪ Conduct periodical internal audits to ensure that mitigation measures are being identified, implemented and monitored including periodical visual inspections of temporary stockpiles of excavated soil; ▪ Keep on site the records of the internal audits, logs, registers including the amounts of excavated soil per month, the amounts of generated waste soil per month and the number of inspections completed.	construction phase	

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
	stored and - when possible - used for backfilling or for landscaping after the end of construction; ▪ The excavated areas/surfaces will be backfilled by using soil having similar characteristics to the original, natural one; ▪ The excavated soil waste not re-used will be properly stored and then conferred to a licensed company for its disposal; ▪ The moving vehicles, equipment and machineries will follow predefined paths and roads for avoiding unnecessary over-consolidation of soil and prevent							

Mitigation measure						Monitoring activities		
Item	**Mitigation Measures/Actions**	**Timeline and frequency**	**KPI**	**Target**	**Responsibility**	**Verification method**	**Frequency**	**Responsibility**
	potential environmental pollution; ▪ The random mixing of excavated soil and bedrock materials will be avoided.							
Soil-06	**<u>Avoidance: Soil pollution</u>** ▪ The mitigation measures found in the Waste and Hazardous Materials MP: - WHM-5 - WHM-6 - WHM-8 - WHM-9 - WHM-10 and - WHM-11 and in the Wastewater MP: - Ww-3 - Ww-5 will be followed to prevent any soil contamination from	During all period of construction phase	Number of observations and non-conformities made regarding potentially pollutant actions and situations.	No events of intentional or accidental pollution occur on-site.	EPC Contractor HSES Manager	**<u>Monitoring activities:</u>** ▪ Conduct periodical internal audits to ensure that mitigation measures are being identified, implemented and monitored; ▪ Keep the records of the internal audits available on site.	In accordance with the frequency observed in the WHMMP and WMP.	EPC Contractor E&S Specialist

Mitigation measure						Monitoring activities		
Item	**Mitigation Measures/Actions**	**Timeline and frequency**	**KPI**	**Target**	**Responsibility**	**Verification method**	**Frequency**	**Responsibility**
	solid waste, wastewater and hazardous materials/waste.							
Soil-07	**<u>Avoidance: Spreading of potential soil pollution</u>** ▪ In case of leaks and spills, properly trained workers will be appointed for removal the contaminated soil and its replacement with uncontaminated fill sand or other similar soil so that the level of contamination at the site will be immediately decreased and the human exposure to contamination avoided. The procedures in the Emergency Preparedness & Response Plan	During all period of construction phase	Extension of contaminated land	N/A	EPC Contractor HSES Manager	**<u>Monitoring activities:</u>** ▪ Conduct an audits to ensure that mitigation measures are being identified, implemented and monitored; ▪ Keep the records of the internal audits; ▪ In case potential cases are identified, complete soil sampling according to recognized national and international standards shall be performed; ▪ Keep on-site forms, logs and registers of the assessments conducted (i.e., sampling and	When necessary upon the confirmation of a land contaminatio n finding	EPC Contractor E&S Specialist

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
	(EPRP) will be followed; ▪ If any contaminated soil will be found while excavating the Construction site, the soil will be managed and disposed as hazardous special waste; ▪ If contaminated land is suspected or confirmed, the cause will be identified and the pollution will be delimited by securing the polluted land. The local authorities will be contacted for identifying the responsible and the measures to be adopted (e.g., remediation) according to the Project specifications and					analysis campaigns).		

Mitigation measure						Monitoring activities		
Item	**Mitigation Measures/Actions**	**Timeline and frequency**	**KPI**	**Target**	**Responsibility**	**Verification method**	**Frequency**	**Responsibility**
	the Uzbek regulatory framework.							
Soil-08	**<u>Minimization: Soil erosion management</u>** ▪ The mapping of all main elements that can affect drainage will be carried out in order to plan for potential erosion events including the morphology of the site and the pattern of the water flow; ▪ Based on the site mapping, the following site elements will be identified: - Buffer zones; - Access routes for construction and maintenance of sedimentation control devise. - Borrow and waste disposal areas.	During all period of construction phase	Number of soil erosion events Number of extreme rainfall and high winds events	No significant soil erosion events are identified N/A	EPC Contractor HSES Manager	**<u>Monitoring activities:</u>** ▪ Conduct periodical internal audits to ensure that mitigation measures are being identified, implemented and monitored; ▪ Carry out periodical visual inspections of the road drainage and overall site drainage to check for proper functioning; ▪ Keep the records of the internal audits.	Monthly and following rainfall and high wind events during the entire construction phase	EPC Contractor E&S Specialist

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
	▪ A clear planning of erosion and sediment control measures adapted to the construction planning activities will be developed, this shall include measures such as the application of mulch and vegetation and surface runoff control; ▪ Adequate drainage systems will be provided to minimize and control infiltration including road drainage; ▪ In the case of extreme weather events such as torrential rain and very strong winds, construction activities that may be likely to put workers' safety at							

Mitigation measure						Monitoring activities		
Item	**Mitigation Measures/Actions**	**Timeline and frequency**	**KPI**	**Target**	**Responsibility**	**Verification method**	**Frequency**	**Responsibility**
	risk during the event will be suspended; ▪ In case heavy rains leads to the generation of pits and ponds in the construction area, their clean-up will be performed to promote erosion control and a safe job site; ▪ The excavation fronts, considering the lithology on site, will have a natural slope angle of 30° (in case no barrier, mash or other types of soil containing measures will be installed) for preventing further sliding and falls.							
Soil-09	**<u>Soil Restoration:</u>** ▪ The excavation surfaces will be restored and re-	At completion of the construction phase or sooner	Percentage of excavated surfaces presenting	100% for non-constructed areas	EPC Contractor HSES Manager	**<u>Monitoring activities:</u>** ▪ Conduct periodical internal audits to ensure that	According to provisions of the BMP and IASMP	EPC Contractor E&S Specialist

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
	vegetated as soon as possible. The revegetation will be carried out following the provisions of the BMP and the IASMP.		successful restoration			mitigation measures are being identified, implemented and monitored; ▪ Carry out periodical visual inspections of restored areas; ▪ Keep the records of the internal audits.		

5.0 RISK MANAGEMENT

To safeguard the well-being of employees, protection of the environment, and overall business sustainability, the Site Management Team, or Contractor shall be required to adopt a risk management approach. This approach involves identifying potential hazards, conducting risk assessments for work activities, implementing suitable control measures, monitoring, and overseeing the risks, and effectively communicating these risks to all stakeholders involved.

5.1.1 Risk Assessment

Both the Site Management Team and Contractors are responsible for conducting risk assessments for all their respective activities that have the potential to cause harm. These risk assessments must be performed at the following stages, as a minimum:

i) Before the commencement of activities;

iii) Prior to introducing new equipment, procedures, or processes; and

iv) When there are significant modifications made to existing equipment, procedures, or processes.

This assessment will be continually updated and accomplished by completing the following two documents:

- Risk Assessment Map (refer to **Appendix G – Risk Assessment Matrix– H&S** of the Voltalia's HSES Management Plan);
- Direct and Indirect Environmental Aspects Matrix (refer to **Appendix H – Risk Assessment Matrix – Environmental Aspects** of the Voltalia's HSES Management Plan).

The preparation of the Risk Assessment documents will follow the methodology specified in the Voltalia Occupational Risk Evaluation and Environmental Aspects Evaluation Procedures.

5.1.2 Risk Assessment and Method Statement (RAMS)

In addition, for any Project related works involving high-risk activities, a Risk Assessment and Method Statement (RAMS) shall be prepared by following the template provided in Appendix I – Risk_Assessment_&_Method_Statement_Template of the Voltalia's HSES Management Plan.

The Site Management Team is responsible for preparing the RAMS for the work they undertake, as well as reviewing and approving RAMS submitted by Contractors for their tasks.

Both Risk Assessment and RAMS shall be considered living documents and will be updated when required due to changes to the work.

5.1.3 High Risk Work Permits

All the identified High-Risk activities of the Project will be subject to the rules defined in Section 5.4.3 of the Voltalia's HSES Management Plan. These high-risk activities shall be subject to a specific Permit-To-Work (PTW) procedure, identifying the interveners, their competences and authorizations. The list of considered activities that are deemed High-Risk are found in Section 7.1 of the Voltalia's HSES Management Plan. This list is not exhaustive, and any other high-risk activity identified should be subject to a PTW. The requestor shall apply for a PTW of any High-Risk Activities undertaken within their area of supervision (refer to Appendix J – Permit to Work Request of the Voltalia's HSES Management Plan).

5.1.4 Interface Management and Management of Change

Considering that the simultaneous execution of two or more tasks in a shared space may have varying impacts on each other and potentially lead to unsafe conditions, an interface management process shall be implemented to prevent the accumulation of hazards within the same area or system. The interface management process will

be of responsibility of the Site Management Team. For the implementation of this process, Section 5.4.4 of the Voltalia's HSES Management Plan shall be referred to.

In addition, Voltalia will have a management of change process in place during the construction phase to ensure that all permanent and temporary changes to Project design, systems, processes, procedures, equipment, organization, personnel, products, materials, and work methods are correctly understood and implemented, without introducing any significant hazard or risk to people and the environment. The management of change process will be responsibility of the Site Management Team / HSES Manager. For the implementation of this procedure, Section 5.4.5 of the Voltalia's HSES Management Plan shall be referred to.

6.0 INCIDENT MANAGEMENT

All good catches and incidents that cause or have the potential to cause personal injury or damage to property or the environment shall be reported and investigated to prevent re-occurrence (refer to the Voltalia Incident Management Procedure). This procedure provides information on how to achieve the minimum standards to ensure HSE Incidents are identified, reported, and investigated in a consistent and effective manner. Its purpose is to ensure all Incidents, including near misses and HSE Good Catches, are reported, investigated, and analyzed to identify where management controls failed and recommendations to identify new or restore controls are implemented. Early sharing of lessons learned to facilitate prompt corrective and preventive actions where similar situations are found shall be applied to prevent a recurrence both locally and at other locations.

The main protocols to be followed by the Site Management Team and Contractors regarding incident management are found in Section 5.6 of the Voltalia's HSES Management Plan.

7.0 AUDIT AND REVIEW

The correct implementation of this Plan is verified through internal inspections. The schedule, the frequency, the scope and objectives of the inspections as well as the responsible internal auditors shall be selected on the basis of Section 10 of the Voltalia's HSES Management Plan (Performance Measurement and Monitoring).

Internal auditing shall address:

- the correct implementation of all applicable standards (Uzbek regulatory framework, IFC PSs, EBRD PRs and WBG General EHS Guidelines);
- the correct implementation of this Management Plan;
- the correct implementation of Contractors' Plan to reflect the requirements of this Plan;
- the development and timely implementation of an auditing and review system by Contractors; and
- the implementation of the points indicated in the table in section 4.0 (mitigation measures/actions and monitoring activities) of this Plan;

Evidence and results of the inspection activities shall be formally recorded in the Voltalia dedicated inspection tool. Any Non-Conformity and Preventive/Corrective actions identified during the inspections must be tracked to ensure suitable close out. Voltalia's HSES Manager will review results of inspections and the progress of the implementation of any Preventive/Corrective actions.

A sample of inspection checklist that can be used by the Site Management Team is accessible on the Voltalia Intranet through the HSE HUB and also attached for reference in **Appendix M – HSE Inspection Checklist Form** of the Voltalia's HSES Management Plan, likewise an online inspection tool is available for the performance of HSE Inspections by non-HSE functions Voltalia personnel.

Additional details related to the construction phase of the Project are expected in due course; this Plan shall therefore be subject to a systematic review process during the construction phase in order to encompass and consider any information relevant to soil, drainage and erosion control matters. This Plan will be reviewed either once a year or based upon need on the basis of the occurrence of significant changes in the soil, drainage and erosion control-related activities (whichever happens sooner). Revision of this Management Plan will be the responsibility of the Project Manager, in collaboration with the HSE Manager, who is in charge of this Plan's implementation.

8.0 TRAINING REQUIREMENTS

This Section provides the training requirements and guidance for Contractors and Sub-Contractors to ensure that their training activities are carried out in compliance with this Plan.

8.1 HSE Induction

The EPC Contractor and Voltalia's Site Management Team will be responsible for providing to all workers involved in the construction activities, including staff and workforce of Sub-Contractors, a Site Induction Training (presentation or video, to be defined by the Site Management Team) before the commencement of any activity at the working site, as well as a copy of the Voltalia HSES Management Plan. Attendance at HSE Induction should be mandatory and include all staff and workforce. Any new employee, contractor, visitor or other individual visiting the site during the Project shall receive the same induction information. Visitors will always be escorted in the Project site. The individual should be taken through the induction by an experienced person. The HSE induction will be aimed at providing workers with basic information about Project-related HSE risks and impacts and the prevention, mitigation measures in place in order to ensure personal protection and prevention of any injury.

HSE Induction shall be organized in the languages understood by all personnel (if necessary, the Contractor shall provide a translator).

No person will be permitted to work on site until specific site induction has been completed and records of such training maintained.

The HSE induction will include (not limited to) the following key messages:

- HSES Policy and Golden Rules of Voltalia Group;
- The roles and responsibilities for HSES in relation to the implementation of this Plan;
- Standard site rules;
- Arrangements for first aid, welfare facilities, fire and evacuation, accident, and incident (near-misses and good-catches) reporting;
- Gate security the need for HSE cards to access;
- Access to toilets, water, clinic, ambulance and emergency meeting point;
- Dedicated grievance mechanisms for workers or community, accessible by phone, mail or walk in;
- Key safety signs: live electricity, no access, first aid, speed reduction, maximum speed, etc;
- Use, storage, and maintenance of the PPEs to be used: helmet, mask, vest, safety shoes, etc;
- Emergency procedures and contacts;
- Project specific HSES requirements / mitigation / control measures;

- Projects abide by international HSE best practice; violating staff shall be subject to disciplinary actions according to the Voltalia disciplinary action matrix;
- Mitigation measures for the risks and impacts including those applicable to soil, drainage and erosion control management, such as: Polluting the soil and surrounding environment is not acceptable.

At the end of the HSE induction, an easy and visual means of identification on site must be put in place to verify that personnel on site are authorized to work and have followed the induction (stickers, badges or cards). The visual identification shall be returned at the end of the work/visit.

Should there be any substantial changes in the Project activities related to soil, drainage and erosion control management, then the workers shall receive additional training on the basis of the new information.

8.2 Specific Training

HSE training shall be provided to ensure that all workers involved in the construction activities, including staff and workforce, are prepared for the specific hazards of individual work assignments.

All Contractors will be responsible for carrying out specific training for their operatives covering all items pertinent to their work, and providing evidence of the training (refer to section 6.1 – Access Requirements of the Voltalia's HSES plan).

The responsible for soil, drainage and erosion control inspections and monitoring campaigns shall receive adequate training to their specific activities in order to ensure they work in compliance with the ESHS requirements of the Project.

Specific training related to soil, drainage and erosion control management shall be provided to all staff and workforce that will manage soil, drainage and erosion aspects. The key elements of the training shall include:

- Knowledge of soil management measures and reinstatement works;
- Known hazards in working related to soil management operations and how they are controlled;
- Potential risks to health and safety related to soil management, in particular related to soil contamination;
- Precautions to prevent exposure to risks related to soil management, in particular related to soil contamination;
- Correct use and application of PPE and clothing for soil management operations;
- Appropriate response to emergency conditions, incidents and accidents including soil contamination events;
- Soil contamination awareness;
- Safety signage; and
- Soil storage and handling requirements.

Should the HSE performance monitoring results (such as recurrent incidents or near misses related to soil, drainage and erosion control management) demonstrate that a reinforcement is required, further site awareness on soil, drainage and erosion control management shall be provided to all workers and customized on the basis of the types of incidents /near misses or KPIs recorded.

8.3 Risk Assessment and Method Statement (RAMS) Training

A training in RAMS will be provided to all workers involved in the works within the RAMS scope, prior to the start of these works. The content of the training will be specified in the specific RAMS.

8.4 Toolbox Talks

Toolbox talks will be carried out at regular intervals prior the initiation of the days works or upon need throughout the day. These shall be brief meetings or training sessions facilitated by Voltalia or Contractors aim to address specific and pertinent HSES topics with workers. The objective shall be to enhance awareness, disseminate crucial information, and strengthen adherence to HSES work practices. The Site Management Team may mandate these sessions for Contractors, focusing on specific topics in response to identified needs or observed shortcomings on the site. The frequency of these meetings shall be commensurate to the risks and impacts associated with the ongoing phase of the project at the time.

9.0 REPORTING

This section provides instructions and requirements for the reporting on the implementation of mitigation measures/actions, monitoring activities and internal auditing.

9.1 Reporting of the monitoring activities

Evidence and results of the monitoring activities (detailed in Table 2) must be described in detail in appropriate monitoring reports to be prepared as frequent as indicated in the table. These monitoring reports must include the following minimum information/data (where relevant):

- Scope and Purpose of the monitoring activity;
- Reference to the approved SoilMP.
- Description of the monitoring effort and applied methodology, including start and end dates of the monitoring period covered by the report, location of monitoring activities (geographical coordinates in WGS84 system and elevation) and map of surveyed areas;
- Timing of data collection (start date and end date);
- Applicable KPI according to Table 2.
- Conclusions on compliance vs. KPI, and eventual observations including the reasons for the deviations, if applicable;
- Name and personal data of staff responsible for implementing the specific monitoring activities (including reference to this Management Plan and reference to the appointment of third parties eventually contracted to perform part of the activity, e.g. external laboratories and consultants);
- Implications, modifications, adjustments and/or recommendations that could be adopted in response to observed results from the monitoring activities and any other recommendations for improvements to the SoilMP;
- Suggestions for future projects based on lessons learned;
- Quality control procedures applied to ensure consistency and reliability of the analyses or results;
- Analytical certificates from the laboratory/ies (where applicable);
- Summary of any incidents or accidents, analysis of the root causes and lessons learned and documentation of any corrective actions taken.

9.2 Reporting of the auditing activities

The implementation of this Management Plan must be audited according to the requirements included in Voltalia's E&S Management System and section 6.0 "Audit and Review" of this Management Plan.

Evidence of the implementation of the mitigation measures/actions, of the timely deployment of monitoring activities (detailed in section 4.0) and of related results are described in the audit reports. These audit reports must include the following minimum information/data:

- List of the items audited (detailed in section 4.0)
- Information whether the items have been implemented within the indicated timeline and frequency;
- Achievement (or not) of the KPIs;
- Description of non-compliances eventually identified; and
- Description of correction measures to be applied;

Signature Page

Table 3: Details of the Undersigned

Name (position)	Entity	Date	Signature

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