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*Workers' Accommodation Management Plan (WAMP) -  
Construction Phase*

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*Khorzem Solar 100MW | Uzbekistan*



## Record of Issue

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# Table of Contents

1.0 INTRODUCTION .....	<b>Error! Bookmark not defined.</b>
1.1 Purpose and Scope .....	6
1.2 Relationship with other Management Plans .....	6
1.3 Project Overview.....	7
1.3.1 Project Workers' Accommodation Needs and Effects	11
2.0 REFERENCE & LEGAL REQUIREMENTS.....	14
2.1 National Requirements .....	15
2.2 International Standards.....	19
2.3 Necessary Permits and Approvals .....	21
3.0 ROLES AND RESPONSIBILITIES .....	22
4.0 MITIGATION MEASURES/ACTIONS AND MONITORING ACTIVITIES.....	30
5.0 RISK MANAGEMENT .....	38
5.1.1 Risk Assessment	38
5.1.2 Project Accommodation Risk Assessment	38
5.1.3 High Risk Work Permits	38
5.1.4 Interface Management and Management of Change	38
6.0 INCIDENT MANAGEMENT .....	39
7.0 AUDIT AND REVIEW .....	39
8.0 TRAINING REQUIREMENTS.....	40
9.0 REPORTING.....	41
9.1 Reporting of the monitoring activities .....	41
9.2 Reporting of the auditing activities.....	2

## TABLES

Table 1: Roles and Responsibilities. ....	22
Table 2: Mitigation measures/actions for construction phase. ....	32

Figure 1: Project Region. Source: NBT, 2023. ....	8
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## FIGURES

Figure 1: Project Region. Source: NBT, 2023. ....	8
Figure 2: Project area and surroundings. Source: NBT, 2023. ....	9

## APPENDICES

# **Acronyms and Abbreviations**

EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health and Safety
EPC	Engineering, Procurement and Construction
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
GIIP	Good International Industry Practice
ID	Identification code
IFC	International Finance Corporation
IGM	Internal Grievance Mechanism
KPI	Key Performance Indicator
LC	Least Concern
LSA	Local Study Area
MP	Management Plan
MW	Megawatt
NEGU	National Electric Grid of Uzbekistan
Obs.	Observed
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
SPPP	Solar Photovoltaic Power Plant
TMP	Traffic Management Plan
WBG	World Bank Group

This document is the Workers' Accommodation Management Plan (WAMP) 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 workers' accommodation aspects. This Plan sets the principles according to which workers' accommodation 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 Uzbek regulatory framework, International Finance Corporation (IFC) Performance Standards (PSs), EBRD Performance Requirements (PRs), Good International Industry Practices (GIIP) and the World Bank Group's (WBG) General Environmental, Health and Safety (EHS) Guidelines and the Workers' accommodation: processes and standards guidance note by IFC and the EBRD.

## 1.1 Purpose and Scope

The main objective of this document is to develop and implement plans and procedures to integrate environmental, health, safety and social aspects related to workers' accommodation 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 subcontractors to address workers' living conditions according to the international and local standards, as well as Lenders' requirements.

The scope of this Plan includes:

- The definition of Project standards related to workers' accommodation 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 workers' accommodation. 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 and communities;
- 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

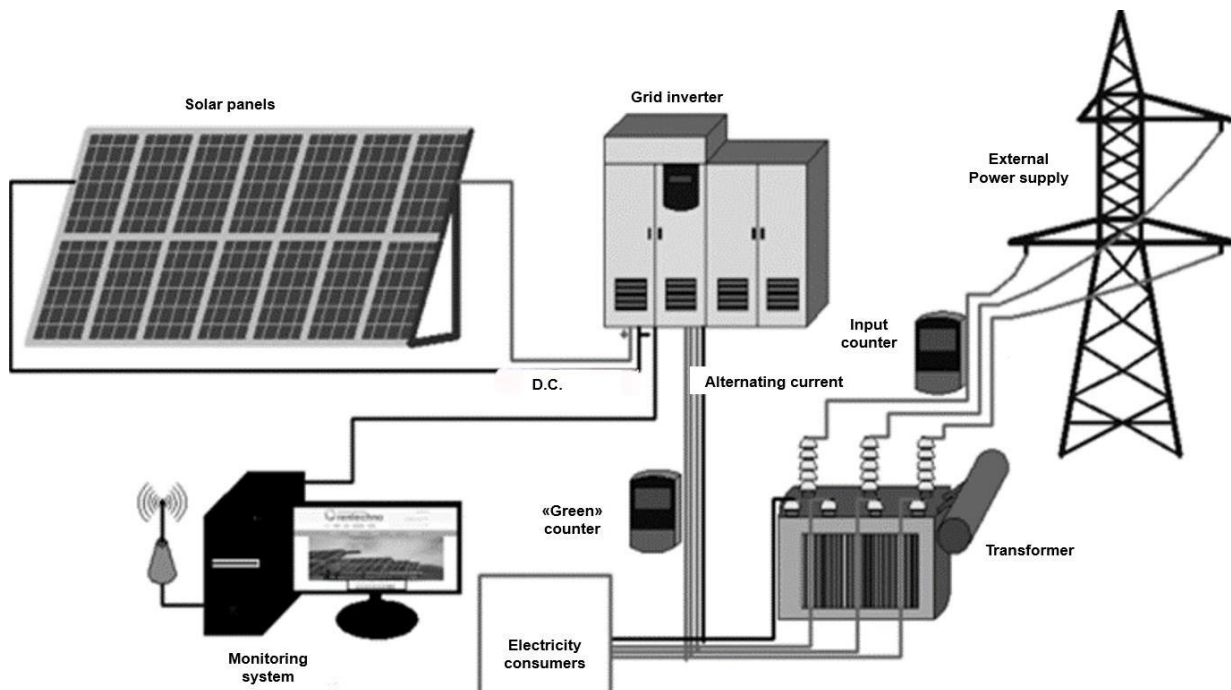
The WAMP is to be read in conjunction with the following management plans:

- Air Quality Management Plan;
- Community Health, Safety and Security Management Plan;
- Emergency, Preparedness & Response Plan (EPRP).
- Labour Management Plan (LMP);
- Noise Management Plan;
- Occupational Health and Safety (OHS) Management Plan;
- Traffic Management Plan;
- Waste Management Plan;
- Wastewater Management Plan;
- Water and Energy Sources Management Plan; and

### 1.3 Project Overview

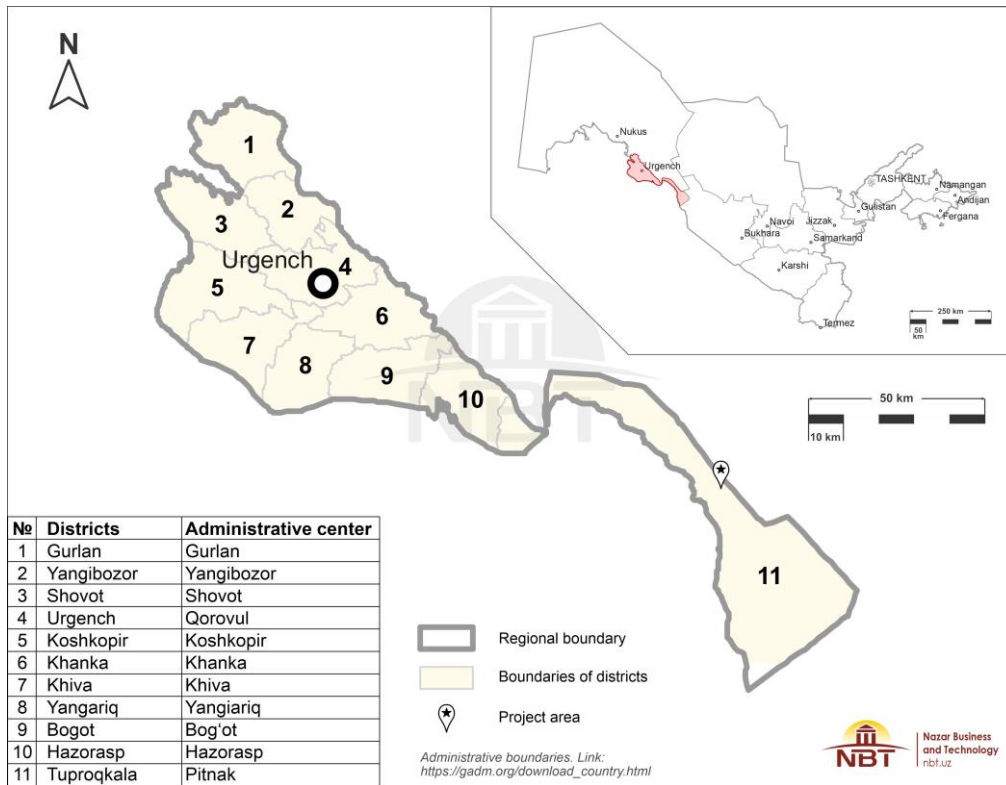
The Khorezm Solar PV Project (the Project) consists in the development of:

- 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**

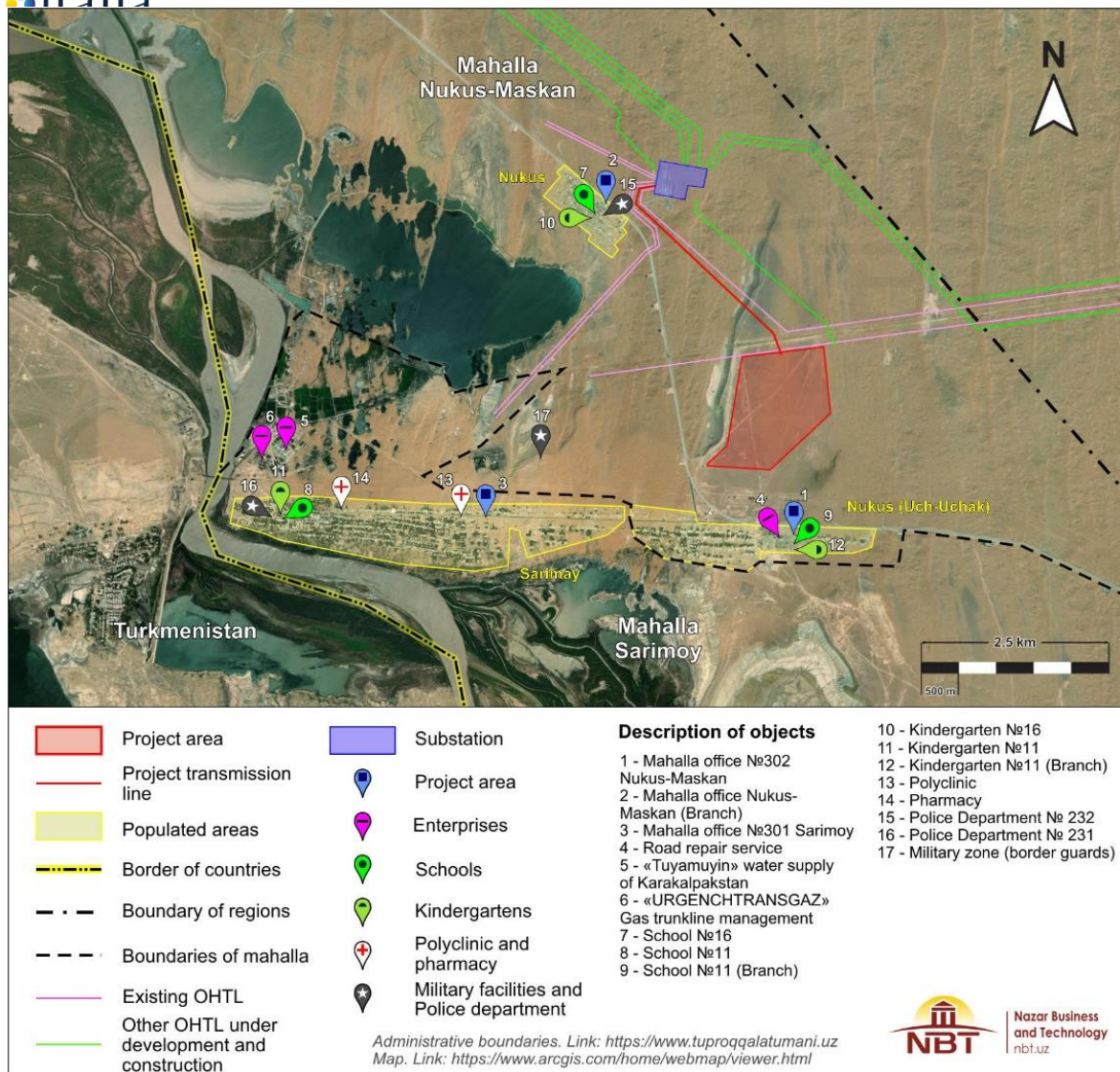
The Project will be carried out in the Tuprokkala district in the Khorezm region of Uzbekistan, located 120 km south-east of Urgench city, close to the border with Turkmenistan and near the Amu-Darya River. The limits of the Khorezm region and the approximate location of the Project are observed in Figure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



**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 Votalia 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 other;

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.

Based on the “Social Components Impact assessment” (ESIA Section 08C), it is expected that approx. 200 workers will be employed for the Project construction activities. The Project aims at employing local workforce to the extent possible, however it is expected that a share of workers will come and from abroad. other parts of Uzbekistan

The workers will be housed either in a specific camp will be set up to accommodate the Project workforce, a housing complex that will be adapted for the project; and/or, for local workers, in their own existing neighbouring homes (all together considered the ‘Project Accommodation’).

The demand of workers coming from other parts of Uzbekistan and from abroad will lead to an influx of population in the Social AoI. The population in the villages of Sarimay and Nukus Maskani is of approx. 4,700 people, therefore the influx generated by workers is not considered significant compared to the overall population present in the area. As it is expected for most workers to be accommodated in the camp or the housing complex, limited housing at local level will be required during the construction phase, hence the influx of population is not expected to generate effects on the local housing situation.

The arrival of external workers can generate potential impacts in terms of community health, safety and security. In particular the presence of workers from other parts of the country and from abroad may increase the possibility of spread of communicable diseases due in general to the increased presence of persons and to increased interactions between workers and local population. Gender-based violence is also considered a risk, as most of the workers will be males, and some from other areas of the country, which don't necessarily feel the societal pressure to follow certain behavioural codes. As mentioned, it should be noted however that the number of workers in the construction phase is limited, and efforts will be done to increase inasmuch as possible the number of workers will come directly from the AoI.

In terms of safety, the presence of workers can generate tensions and disturbance with local communities, due to the interactions between workforce and the people, such as the visits of the workers to the villages, increased noise, increased movement, and activity. These disturbances may affect women and vulnerable groups more than others. Also, in this case the impacts are expected to be limited, considering that workers will be accommodated in a camp or housing complex and interactions with the local population will be reduced. In addition, based on key informant interviews performed during two visits in site (with active participation from women as well), local communities in Sarimay and Nukus maskani are used to similar construction activities that have been performed in the past and no tensions and conflicts in those occasions were mentioned.

The influx of workers can lead to risks in relation to the pressure on local services and resources such as the availability of food and water, the capacity of the local sewage, water distribution and waste systems.

The camp and/or housing complex will have adequate housing conditions for workers, will be located at a close distance to the Project site, and will count with access to the requires services such as water, sewerage, electricity and transport. In addition, all the required or essential services are available for workers. EPC Contractor and its subcontractors, as applicable, will implement the following measures in order to avoid, minimize and control impacts and risks related to accommodation issues. Such requirements take into account those included within the “Workers' Accommodation: Processes and Standards. A Guidance Note by IFC and the EBRD” (2009).

The location criteria of the workers' accommodation camp considered the following:

- Includes prevention measures in terms of exposure to key natural hazards (e.g., flood zones or major wadis) as well as locations that can provide habitats for potential disease vectors such as mosquitoes, flies and others (e.g., stagnant waters);
- Located at a reasonable distance from the construction site to avoid impacts of noise, dust and other emissions;
- Acquiring adequate materials with sufficient maintenance (kept in good repair, clean and free from rubbish and other refuse); and,



- Includes heating, air-conditioning and ventilation, which is appropriate for the climatic conditions and provide workers with a comfortable and healthy environment.

The Site Management Team and Contractor/Subcontractors shall ensure that workers' accommodation meets the following requirements:

- Accommodation design:
  - Separate bed for each worker;
  - Adequate headroom, providing full and free movement, of not less than 203 centimetres;
  - The minimum inside dimensions of a sleeping space should be at least 198 centimetres by 80 centimetres;
  - Beds should not be arranged in tiers of more than two;
  - Separate accommodation of the sexes;
  - Adequate natural light during the daytime and adequate artificial light;
  - Adequate ventilation to ensure sufficient movement of air in all
  - Conditions of weather and climate;
  - Heating where appropriate;
  - Adequate supply of safe potable water;
  - Adequate sanitary facilities (see below);
  - Adequate drainage;
  - Adequate furniture for each worker to secure his or her belongings,
  - Common dining rooms, canteens or mess rooms, located away from the sleeping areas;
  - Appropriately situated and furnished laundry facilities;
  - Rooms should indicate the permitted number of occupants.
  - The number of changing rooms shall comply with Volitalia' s HSE Minimum Requirements (VMR) applicable specifications, as a minimum. If not indicated in the VMR, the ILO standards shall apply
  - First aid facilities available at all times while workers are in the camps;
  - Changing rooms for male and female employees;
  - Designated areas for rest and entertainment, and mess halls where workers shall not be exposed to hazardous or noxious substances. Only food consumption in designated areas shall be permitted;
  - Individual and locked storage for personal protective equipment (PPEs) and personal belongings;
- Sanitation facilities:
  - A minimum of one toilet, one wash basin and on tub or shower for every six persons
  - Hot and cold fresh running water
  - Separate sanitary facilities provided for men and for women
  - Sanitary facilities should have ventilation to the open air, independent of any other part of the accommodation
  - Soap and hygienic paper should be adequately stocked
  - Allowances shall be made for either segregated facilities, or for indicating whether the toilet facility is "In Use" or "Vacant". Toilet facilities shall be provided with adequate supplies of water, soap, and single use towel.
- Health and Safety:
  - Accommodations should be kept free of rats, mice, insects and vermin
  - In areas where mosquitoes are prevalent, workers should be provided netting.
- Miscellaneous:
  - Drinking water (at least 1.5 litres/person/day);
  - Drinking water shall meet drinking water quality or for bottled/packageged natural mineral waters and drinking waters standards. Adequate supplies of potable drinking water shall be provided



with a sanitary means of collecting the water for the purposes of drinking. Water supplied to areas of food preparation or for the purpose of personal hygiene (washing or bathing) shall meet drinking water quality standards;

- Any waste generated during the construction phase shall be managed and minimised in accordance with the Waste Management Plan. Voltalia shall work toward the eradication of Plastic in our Operations and Constructions. For this reason, Voltalia promotes the reduction and elimination of plastic from its supply chain and do not allow the usage of single-use plastics. All sites must avoid single use plastic such as cups, bottles, and packages wherever it is possible; and
- Smoking shall be only authorized in designated areas, located outdoors and not within 6 meters of the entrance, window, or air intake of a building. Designated smoking areas must be fitted with a fire extinguisher of the appropriate type, and with ashtrays and waste bins of sufficient capacity and cleaned regularly. Designated smoking areas must be sheltered against wind and rain. "No smoking" signs, in line with the local regulation and written in English and the relevant languages so that they can be understood by the workforce must be clearly posted at all entrances of buildings and in the welfare areas.

## 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;
- Workers' accommodation: processes and standards A guidance note by IFC and the EBRD<sup>1</sup>;
- Other Good International Industry Practices (GIIP);
- Votalia's policies, related practices, and procedures; and
- Votalia Ethics Guide and Code of Conduct and Votalia Health & Safety Policy, which are detailed in the chapter below.

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.

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<sup>1</sup> [Workers' accommodation: processes and standards \(ebrd.com\)](#)

## 2.1 National Requirements

The following state agencies apply to the Project:

- The **Ministry of Construction, Housing and Communal Services**. This ministry is tasked with coordinating unified scientific research and formulating technical policies related to urban planning, engineering, and technical surveys for construction. It aims to implement energy-efficient and innovative projects and solutions in construction activities to enhance labour productivity, reducing the cost of construction and installation works while rationalizing the use of resources.
- The **Ministry of Health** is responsible for developing and approving sanitary regulations, rules, and hygienic standards. It is also tasked with conducting state sanitary supervision to ensure compliance with these regulations and providing methodological oversight to sanitary and epidemiological services.
- The **Ministry of Water Resources** is mainly responsible for implementing a unified state policy concerning water resources management. It also coordinates the efforts of various state bodies, economic entities, and organizations in the rational utilization and protection of water resources, as well as in the prevention and mitigation of water-related hazards.

For what concerns workers' accommodation, the following regulations and legislations apply:

- Labour Law of the Republic of Uzbekistan, Article 10 stipulates:
  - *If an international treaty ratified by the Republic of Uzbekistan and Uzbekistan Convention of the International Labour Organisation set more favorable rules for workers in comparison with legislative or other normative acts on labor of the Republic of Uzbekistan, the rules of the international treaty or convention.*
  - *Rules of international treaties ratified by the Republic of Uzbekistan or Uzbekistan conventions of the International Labour Organisation shall apply in cases where the employment relationship is not explicitly regulated by legislation.*
- BR&N No 2.01.08-96 – Noise protection;
- BR&N No 3.01.02-00 - Construction Safety Standards.
- SanR&N No 0339-16 - Sanitary Rules and Norms for Planning and Development of Populated Areas of Uzbekistan;
- SanR&N No 0022-22 - Sanitation rules hygiene requirements for the organization of construction production and construction work;
- SanR&N No 0318-15 - Hygienic and anti-epidemic requirements for the protection of water in reservoirs on the territory of the Republic of Uzbekistan;
- SanR&N No 0255-08 - Main criteria for hygienic assessment of the water bodies contamination for assessing health risks for population in Uzbekistan;
- SanR&N 0202-06 - The procedure for issuing permits for special water use, development and approval of projects of maximum permissible discharges (MPD) of substances entering with wastewater into water bodies and on the terrain;
- SanR&N 0293-11 - Hygienic standards list of maximum permissible concentrations (MPC) of pollutants in the atmospheric air of populated areas on the territory of the Republic of Uzbekistan;
- 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;
- O'z DSt 1057:2004 - Vehicles. Safety requirements for technical conditions;

In terms of working and living conditions, the Constitution of the Republic of Uzbekistan includes a chapter on the economic and social rights of citizens stating the following:

- i) Everyone has the right to decent work, to free choice of profession and occupation, favourable working conditions that meet the requirements of safety and hygiene, to fair remuneration for work without any discrimination and not below the established minimum wage, as well as protection from unemployment in the manner prescribed by law. The minimum wage is determined taking into account the need to ensure a decent standard of living for a person. It is forbidden to refuse to hire women, dismiss them from work and reduce their wages for reasons related to pregnancy or the presence of a child. (Article 42)
  - ii) The state takes measures to ensure the employment of citizens, protect them from unemployment, and reduce poverty. The state organizes and encourages professional training and retraining of citizens. (Article 43)
  - iii) Forced labour is prohibited except in the execution of a sentence imposed by a court decision, or in other cases provided for by law. Any form of child labour that poses a threat to the health, safety, morals, mental and physical development of a child, including those that prevent him from receiving an education, is prohibited. (Article 44)
  - iv) Everyone has the right to rest. Employees have the right to rest by establishing the length of working hours, days off and non-working holidays, paid annual leave. (Article 45).
- i) A base document for work relations is the **Labour Code of the Republic of Uzbekistan**, introduced in April 1996. It addresses provisions relating to non-discrimination in labour relations, protection of labour rights, subjects of labour relations, representation of workers and employers, collective agreements and collective bargaining, job placement, labour contracts, working time, rest and leave, wages, guarantee and compensation payments, labour discipline, the material responsibilities of labour contract parties, labour protection, additional guarantees and advantages to certain categories of workers, labour disputes, and State social security.
  - ii) The supervision and monitoring of compliance with Labor Code requirements and the protection of labour rights of citizens is implemented by the State Labor Inspection under the **Ministry of Employment and Poverty Reduction of the Republic of Uzbekistan**, and its territorial subordinate structures. The Ministry of Employment and Poverty Reduction is the main institution responsible for labour, employment and social protection policy making. The ministry is tasked with the development and regulation of the labour market and ensuring the employment of the population, the regulation of labour relations and labour protection, the provision of social services for the population, and medical-social rehabilitation of persons with disabilities.
  - iii) Other national legislations regulating labour in Uzbekistan are:
    - **The Law on “Labour Protection”**, enacted on September 22, 2016, which further improves the labour protection system by strengthening the responsibilities of employers and workers, defining public authorities’ powers to ensure the proper monitoring of working conditions and safety, increasing the efficiency of public control, and bringing certain provisions of the current law in accordance with the requirements of the newly adopted legislative acts into the modern market economy.
    - **Occupational Health and Safety (OHS)** legislation which comprises the Labor Code, the Law on Occupational Health and Safety, the decrees of the President of the Republic of Uzbekistan, Occupational Health and Safety standards, decisions of executive government agencies taken within their competence in the form of decrees, executive orders, regulations, directives, rules and others.

- The **Law on Occupational Safety in Hazardous Production Facilities**, enacted on August 25, 2006, which stipulates the legal, economic and social terms of ensuring safe exploitation of hazardous production facilities, with the aim of building enterprise capacity and preventing accidents.
  - Located at a reasonable distance from the construction site to avoid impacts of noise, dust and other emissions;
  - Acquiring adequate materials with sufficient maintenance (kept in good repair, clean and free from rubbish and other refuse); and,
  - Includes heating, air-conditioning and ventilation, which is appropriate for the climatic conditions and provide workers with a comfortable and healthy environment.

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  - Adequate supply of safe potable water;
  - Adequate sanitary facilities (see below);
  - Adequate drainage;
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  - Soap and hygienic paper should be adequately stocked





- Allowances shall be made for either segregated facilities, or for indicating whether the toilet facility is "In Use" or "Vacant". Toilet facilities shall be provided with adequate supplies of water, soap, and single use towel.
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  - Drinking water shall meet drinking water quality or for bottled/packageged natural mineral waters and drinking waters standards. Adequate supplies of potable drinking water shall be provided with a sanitary means of collecting the water for the purposes of drinking. Water supplied to areas of food preparation or for the purpose of personal hygiene (washing or bathing) shall meet drinking water quality standards;
  - Any waste generated during the construction phase shall be managed and minimised in according with the Waste Management Plan. Voltaia shall work toward the eradication of Plastic in our Operations and Constructions. For this reason, Voltaia promotes the reduction and elimination of plastic from its supply chain and do not allow the usage of single-use plastics. All sites must avoid single use plastic such as cups, bottles, and packages wherever it is possible; and
  - Smoking shall be only authorized in designated areas, located outdoors and not within 6 meters of the entrance, window, or air intake of a building. Designated smoking areas must be fitted with a fire extinguisher of the appropriate type, and with ashtrays and waste bins of sufficient capacity and cleaned regularly. Designated smoking areas must be sheltered against wind and rain. "No smoking" signs, in line with the local regulation and written in English and the relevant languages so that they can be understood by the workforce must be clearly posted at all entrances of buildings and in the welfare areas.

## 2.2 International Standards

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

- iv) The International Finance Corporation (IFC) Performance Standards (PS) 2012 and relevant Guidance Notes, in particular:
  - a. IFC Performance Standards and specifically IFC PS1 – Assessment and Management of Environmental and Social Risks and Impacts
  - b. IFC PS2 – Labor and Working Conditions:
    - i. *Aims to promote “safe and healthy working conditions, and to protect and promote the health of workers,” which covers living conditions as well when these are the responsibility of employers. IFC Guidance Note 2 on Labour and Working Conditions specifically mentions the potential danger of forced labour when housing is provided to workers in lieu of payment or where inappropriate charges for housing are levied.;*
  - c. IFC Guidance Notes to Performance Standards on Environmental and Social Sustainability, specifically GN53, GN93-97.
  - d. Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (IFC, 2007). The handbook is a concise guideline, developed by IFC, providing best practices and strategies for effective stakeholder engagement, particularly tailored for companies operating in emerging markets.
  - e. Workers’ Accommodation: Processes and Standards (IFC, 2009). It is a publication by IFC outlining processes and industry standards for appropriate and adequate accommodation for workers. It aims to ensure suitable living conditions and facilities for workers involved in various projects or industries.
- v) EBRD Performance Requirements (PR) (2019), in particular:
  - f. EBRD PR 1 – Assessment and Management of Environmental and Social Risks and Impacts;
  - g. EBRD PR 2 – Labour and Working Conditions, paragraph 16 stipulates:
    - i. *Where a client provides accommodation for workers, the accommodation shall be appropriate for its location and be clean, safe and, at a minimum, meet the basic needs of workers. In particular, the provision of accommodation shall meet national legislation and international good practice in relation, but not restricted, to the following: the practice for charging for accommodation; the provision of minimum amounts of space for each worker; provision of sanitary, laundry and cooking facilities. and potable water; the location of accommodation in relation to the workplace; any health, fire safety or other hazards or disturbances and local facilities; the provision of first aid and medical facilities; and heating and ventilation. Workers’ freedom of movement to and from the employer-provided accommodation shall not be unduly restricted.*
- vi) World Bank Group Environment, Health and Safety (EHS) Guidelines (General and Industry Sector):
  - h. General EHS Guidelines (April 2007) which cover four areas of GIIP: Environmental; Occupational health & safety (OHS); Community health & safety (CHS); Construction and decommissioning;

i. EHS Guidelines for Electric Power Transmission and Distribution (April 2007);

vii) Relevant international conventions and agreements including:

- j. Workers' Housing Recommendation, 1961 (No. 115)
- k. Forced Labour Convention, 1930 (No. 29);
- l. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87);
- m. Right to Organise and Collective Bargaining Convention, 1949 (No. 98);
- n. Equal Remuneration Convention, 1951 (No. 100);
- o. Abolition of Forced Labour Convention, 1957 (No. 105);
- p. Discrimination (Employment and Occupation) Convention, 1958 (No. 111);
- q. Minimum Age Convention, 1973 (No. 138);
- r. Worst Forms of Child Labour Convention, 1999 (No. 182);
- s. Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187);
- t. Labour Inspection Convention, 1947 (No. 81);
- u. Employment Policy Convention, 1964 (No. 122);
- v. Tripartite Consultation (International Labour Standards) Convention, 1976 (No. 144)
- w. Forty-Hour Week Convention, 1935 (No. 47)
- x. Holidays and Pay Convention, 1936 (No. 52)
- y. Maternity Protection Convention, 1971 (No. 135)
- z. Working Environment (Air Pollution, Noise and Vibration) Convention, 1977 (No. 148) The Convention will enter into force for Uzbekistan on 12<sup>th</sup> June 2024
- aa. Collective Bargaining Convention, 1981 (No. 154)
- bb. Safety and Health in Construction Convention, 1988 (No. 167)
- cc. International Labour Organization (ILO) Conventions;

viii) Good International Industry Practice (GIIP).

## 2.3 Necessary Permits and Approvals

The construction of the construction camp requires the following permits, which are listed as follows:

- **Permits on disposal of construction wastes from construction sites and domestic wastes from construction camps** (RCM #40 date from 2021 “On measures for the further improving procedure on construction waste handling,” which shall be issued by the under the Ministry of Ecology, Environmental Protection and Climate Change of the Republic of Uzbekistan (MEEPCC) requiring the use of a Regional Waste Management Company to retrieve waste from the Project Site;
- **Permits on water use from drinking water supply sources** (Law on Water and Water Use, 1993, 2003, Resolution of Cabinet Ministries #255 (2018) “Administrative Order on issuing water use permits.” Resolution of Cabinet of Ministers dated March 31, 2018, N° 256 “On the approval of administrative regulations for the provision of public services to connect to engineering and communication networks”) which shall be issued by the Regional Suvtaminot Agency under the Ministry of Construction and Communal Services (MCCS);
- Permits on special water use from irrigation canals (if needed), which shall be issued by the State committee for Ecology and Environmental Protection and Regional branches of the Ministry of Water Resources Management (MWR) following submission of the application via the E-Gov system as per Law on Water and Water use (1993, 2003), Resolution of Cabinet Ministries # 255 (2018) “Administrative Order on issuing water use permits”. Resolution of Cabinet of Ministers dated Mar. 31, 2018, № 255 “On the approval of administrative regulations for the provision of public services in field of water consumption.” The Special Water Consumption Permit (with electronic digital signature) can be requested via an E-Gov system that includes a fee of 30% of the minimum wage equivalent to 22 USD;
- Permits on special water use from natural water sources (rivers, springs and etc.) – if needed can be issued by the Ministry of Ecology, Environmental Protection and Climate Change of the Republic of Uzbekistan (MEEPCC) as per Law on Water and Water use (1993, 2003), Resolution of Cabinet Ministries # 255 (2018) “Administrative Order on issuing water use permits”. Resolution of Cabinet of Ministers dated Mar. 31, 2018, № 255 “On the approval of administrative regulations for the provision of public services in field of water consumption.” The Special Water Consumption Permit (with electronic digital signature) can be requested via an E-Gov system or a One-Stop-Shop Center that comes with a fee of 30% of the minimum wage equivalent to 22 USD;
- Agreement on disposal of sewage shall be requested to the Regional Oqovasuv Agency under the Ministry of Construction and Communal Services (MCCS) as per RCM #95 dated from 2019 “Rules on disposal of solid wastes and sewage”. Resolution of Cabinet of Ministers dated Mar. 31, 2018, № 256 “On the approval of administrative regulations for the provision of public services to connect to engineering and communication networks” through the submission of request via the E-Gov system to develop technical conditions for water supply and sanitation networks (with confirmation of Electronic Digital Signature). Fees 10% from Based calculation value (BCV) (equivalent to appx. USD 2,5);
- **Permit for cutting trees and bushes** (if needed for construction of transmission line but not needed for PV plant); and,
- **Architectural Planning Assignment** (ref.: Resolution of Cabinet of Ministries dated 20.04.2022 №200.) shall include an Electronic Digital Signature to be submitted online to the **Ministry of Construction** with the following documents (as attachments):
  - Presidential Decree of Project Implementation;
  - Decision of Regional Khokim for Land Allotment; and,
  - Cadaster document.

### 3.0 ROLES AND RESPONSIBILITIES

Votalia 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 the table below. The roles and responsibilities for the implementation of this management plan will be revised according to any significant changes in Votalia’s organisational structure or project.

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
<b>Votalia SPV</b>	
<b>Project Director</b>	<ul style="list-style-type: none"> <li>■ Ensure the Votalia’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;</li> <li>■ 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,;</li> <li>■ Allow sufficient time and adequate resources for the implementation of this Plans requirements;</li> <li>■ Foster HSES leadership culture within the Project: and</li> <li>■ Assign an ESAP owner conversant with EBRD Performance Requirements and Uzbek legislation;</li> </ul>
<b>Health &amp; Safety Site Supervisor</b>	<ul style="list-style-type: none"> <li>■ Supervise workers within their area of supervision, take corrective action when HSES issues are noted and report these issues to the Site Management Team;</li> <li>■ Participate in internal audits and investigation of incidents to determine root cause and corrective actions;</li> <li>■ Supervise close out H&amp;S incident reports and record, monitor and follow up close out of action items in the Action Tracking System.</li> <li>■ Liaise with Site Managers on relevant H&amp;S issues and organize H&amp;S meetings;</li> <li>■ Perform regular site and work front visits and inspections and monitor High Risk Activities;</li> <li>■ 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;</li> <li>■ Liaise with the Lenders on Project E&amp;S performance, to seek alignment between their expectations;</li> <li>■ Review and approve site access HSE documentation;</li> <li>■ Overseeing, managing, and allocating adequate resources for the implementation of the HSES Management System.</li> </ul>
<b>E&amp;S advisor</b>	<ul style="list-style-type: none"> <li>■ Oversee this Plan;</li> </ul>

Role	Responsibilities
	<ul style="list-style-type: none"> <li>■ Ensure that all the environmental authorizations and permits have been obtained in a timely manner;</li> <li>■ Monitor close out of environmental action items in the Action Tracking System;</li> <li>■ Review the Environmental management documents;</li> <li>■ Ensure all corrective/preventive actions related to environmental risks and incidents are implemented;</li> <li>■ Liaise with Site Managers on relevant Environmental issues and plan environmental performance monitoring meetings;</li> <li>■ Supervise and manage the work of the Environmental specialists;</li> <li>■ Review Environmental incident reports;</li> <li>■ 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;</li> <li>■ Ensure implementation of the Project's Management Plans in accordance with environmental permit requirements and ESIA requirements if different;</li> <li>■ Ensure the social components of the Project are compliant with this Plan, permit requirements, local legislation, and Lenders' requirements;</li> <li>■ Ensure that stakeholder engagement during construction is in line with Lender's requirements and national regulations.</li> <li>■ Supervise the work of the Community Liaison Officer and ensure the correct implementation of the stakeholder engagement plan and grievance mechanism;</li> <li>■ Ensure the implementation of the community health and safety management measures;</li> <li>■ In coordination with HR Coordinator, verify that all social measures from LMP are implemented on site;</li> <li>■ 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.</li> </ul>
<b>Voltage - Site Manager</b>	<ul style="list-style-type: none"> <li>■ Day to day supervision of the site;</li> <li>■ Supervision of Project execution timeline and its disclosure to the Site Management Team;</li> <li>■ Ensure compliance of requirements by Contractor at the different phases of the Project (pre-qualification reports, kick off meetings, periodic performance evaluations...);</li> <li>■ Supervise dissemination of the updated version of this Plan to all Site workers, including the EPC Contractor and Subcontractors;</li> <li>■ Supervision of this Plan's requirements implementation through regular site monitoring visits and EPC Contractor and Subcontractors documentation/reports review;</li> </ul>

Role	Responsibilities
	<ul style="list-style-type: none"> <li>■ Supervision of adoption and implementation of disciplinary actions upon failure to comply with requirements;</li> <li>■ Supervision that all workers have proper training to implement the requirements of this Plan;</li> <li>■ Participation and supervision in the worksite Risk Management process (risk assessment, RAMS, PTW, interface management, definition of control measures, and change management); and</li> <li>■ Ensure contractors and service providers compliance with EBRD 2019 PRs and IFC 2012 PSs by including them in the list of applicable E&amp;S requirements to be complied with. Require them, in a legally binding manner, to cascade the requirement down their subcontractors chain.</li> </ul>
<b>HSE Coordinator</b>	<ul style="list-style-type: none"> <li>■ Implementation of the HSE Policies, Sustainability principles, procedures and best practices, transversely to Votalia region;</li> <li>■ Keeping up-to-date with any changes in safety regulations and standards;</li> <li>■ Monitor and ensure that the Projects' E&amp;S objectives are achieved;</li> <li>■ Ensure the Projects' E&amp;S requirements and this Plan are communicated to, and implemented by the Projects' personnel, including the Site Management Team and Contractors;</li> <li>■ Prepare a register of all E&amp;S commitments from the permitted EIA, ESIA and ESAP actions;</li> </ul>
<b>EPC Contractor - Site Management Team</b>	
<b>Project Manager</b>	<ul style="list-style-type: none"> <li>■ Overall delivery of the Project and HSES performance, and assurance of compliance with budget, schedule, project policies, plans and procedures;</li> <li>■ Ensure that the necessary resources, authority, information, are provided to enable the execution of Project's HSES management activities and HSES procedures;</li> <li>■ Ensure that HSES management issues are included in periodic reports to be sent to Site Management Team, and also in reports prepared by Site Management Team to be sent to the Project Owner;</li> <li>■ Submit periodic reports to the Project Owner.</li> <li>■ 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.;</li> <li>■ 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;</li> <li>■ Designating specific personnel on site or at the administrative level for the implementation of the E&amp;S Management System;</li> <li>■ Present monitoring data to Votalia's Corporate Level and to the Lender;</li> <li>■ Liaise with the Project Owner, corporate level HSES team, for implementation of this Plan; and</li> <li>■ Follow-up on any grievances and non-Conformities, non-compliance or deviation from the requirements of this Plan.</li> </ul>
<b>Site Manager</b>	<ul style="list-style-type: none"> <li>■ 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</li> </ul>

Role	Responsibilities
	<p>issued by Site HSES Management Team and the Project Owner as per the HSES Management Plan</p> <ul style="list-style-type: none"> <li>■ Ensure that the international E&amp;S requirements applicable to the Project are included - as conditions - in contracts with Subcontractors and suppliers;</li> <li>■ Instruct and/or train workers on the requirements of this Plan;</li> <li>■ Ensure that Personal Protective Equipment is always available on site and is used whenever required;</li> <li>■ Deliver all the documents required for contractors' validation as per the requirements of this Plan and the Voltage HSES Management Plan;</li> <li>■ Provide to Voltage's Health and Safety Site Supervisor, before the start of any hazardous work, the Environmental Risk Assessment and Method Statement – RAMS;</li> <li>■ Identify the need for specialized Subcontractors to carry out specific tasks on site in compliance with this Plan provisions;</li> <li>■ Coordinate with Voltage's HSE Manager, organize and participate in the auditing activities organization, maintain a program of audits and inspections at the Construction Site;</li> <li>■ Ensure that the raised non-conformities based of this Plan are addressed and resolved as quickly as possible;</li> <li>■ Ensure the planning, preparation and provision of the trainings in order to enable the full implementation of the Plan;</li> <li>■ Check the E&amp;S performance of all Subcontractors in relation to this Plan implementation;</li> <li>■ Verify the compliance with the contractual arrangements and with the Project standards and requirements;</li> <li>■ Provide the monitoring reports to Voltage's Site Management Team through the monthly report;</li> <li>■ Liaise with Voltage's HSE Manager for proposing and discussing – where necessary – potential changes and integrations of the monitoring activities of this Plan;</li> <li>■ Report and resolve the non-conformities raised;</li> <li>■ Notify and report to the Site Manager any Near Misses, hazardous conditions and incidents during construction activities;</li> <li>■ Perform the Contractor Management process (pre-qualification reports, kick off meetings, periodic performance evaluations...); and</li> <li>■ 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.</li> </ul>
<b>HSES Manager</b>	<ul style="list-style-type: none"> <li>■ 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;</li> <li>■ Be conversant with EBRD PRs, IFC PSs and the Uzbek E&amp;S legislation;</li> <li>■ Oversee performance and ensure compliance of the Project with requirements of this Plan through regular meetings with the E&amp;S Site Management Team and review of E&amp;S reports;</li> </ul>



Role	Responsibilities
	<ul style="list-style-type: none"> <li>■ Ensure that sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of actions, measures and monitoring activities;</li> <li>■ Ensure ESMS is in-line with the Project ESMS;</li> <li>■ 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;</li> <li>■ 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;</li> <li>■ Programming inspections and audit activities to monitor the correct implementation of this Plan and of HSE specialist(s) tasks;</li> <li>■ Monitor the compliance of the activities by Site Team, and subcontractors, with the time schedule and conducting regular inspections and audits of the traffic management activities to identify any non-conformances;</li> <li>■ 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;</li> <li>■ Search for continuous improvement through audits and monitoring of the HSE KPIs and internal processes;</li> <li>■ Advise and support the Project Manager and Site Manager on matters related to HSES;</li> <li>■ Develop HSES training and induction schedules and content and deliver the training and induction material such as site induction and toolbox talks; and</li> <li>■ Review and approve H&amp;S Management documents delivered by the Health &amp; Safety Site Supervisor.</li> </ul>
<b>Health &amp; Safety Site Supervisor</b>	<p>Communicate and instruct workers in proper work practices and update instructions as needed, make records of this instruction;</p> <ul style="list-style-type: none"> <li>■ Supervise workers within their area, take corrective action when HSES issues are noted and report these issues to the Site Management Team;</li> <li>■ Participate in internal audits and investigation of incidents to determine root cause and corrective actions;</li> <li>■ Develop and update the Project specific H&amp;S management documents;</li> <li>■ Communicate the Health and Safety (H&amp;S) requirements to Project personnel including Site Manager;</li> <li>■ Develop, review, investigate and close out H&amp;S incident reports and record, monitor and follow up close out of action items in the Action Tracking System.</li> <li>■ Contact point for reporting H&amp;S Near Misses, hazardous conditions, and incidents onsite and takes care of reporting to the Project Manager and the HSE Manager;</li> <li>■ Liaise with Site Managers on relevant H&amp;S issues and organize H&amp;S meetings;</li> <li>■ Deliver the H&amp;S component of training and induction such as site induction and toolbox talks;</li> <li>■ Perform regular site and work front visits and inspections and monitor High Risk Activities;</li> <li>■ Develop, review, and approve risk assessments, RAMS and PTW's. Ensure liaison with other relevant HSES Site Management Team members in this</li> </ul>

Role	Responsibilities
	<p>process to collect their feedback concerning their respective fields of actuation; and</p> <ul style="list-style-type: none"> <li>■ Review and approve site access HSE documentation.</li> </ul>
<b>E&amp;S specialist</b>	<ul style="list-style-type: none"> <li>■ Obtain all E&amp;S authorizations and permits in a timely manner;</li> <li>■ Record and follow up close out of E&amp;S action items in the Action Tracking System;</li> <li>■ Develop and update E&amp;S management documents;</li> <li>■ Report and investigate all E&amp;S risks and incidents to the HSES Manager and Site Manager, and ensure all corrective/preventive actions related to environmental management are implemented;</li> <li>■ Liaise with Site Managers on relevant Environmental issues and plan environmental performance monitoring meetings;</li> <li>■ Develop Environmental incident reports;</li> <li>■ Communicate the E&amp;S requirements to Project personnel and perform necessary training;</li> <li>■ Ensure that stakeholder engagement during construction is in line with Lender's requirements and national regulations.</li> <li>■ In coordination with the HSE site supervisor, ensure the implementation of the community health and safety management measures;</li> <li>■ Address external grievances through the Community Grievance Mechanism and ensure corrective action as per the mechanism; and,</li> <li>■ 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.</li> </ul>
<b>HR Coordinator</b>	<ul style="list-style-type: none"> <li>■ Conduct due diligence to assess and manage labour-related risks associated with the project;</li> <li>■ Ensure compliance with the Project Labor Management Plan through audits, also for subcontractors;</li> <li>■ Coordinate with the E&amp;S Specialist and relevant governmental authorities to ensure legal compliance of subcontractors work conditions;</li> <li>■ Conduct and analyse the workforce surveys as a monitoring tool;</li> <li>■ Oversee that the recruitment processes are fair and transparent;</li> <li>■ Ensure that workers are provided with clear and accurate information about their terms of employment, including wages, working hours, and benefits;</li> <li>■ 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;</li> <li>■ Ensure that workers are paid fair wages in accordance with applicable laws and industry standards;</li> <li>■ Monitor and enforce compliance with working hour limits to prevent excessive overtime;</li> <li>■ Address internal grievances through the Community Grievance Mechanism and ensure corrective action as per the mechanism;</li> <li>■ Ensure that workers have adequate rest periods and time off;</li> <li>■ Oversee the communication and implementation of grievance mechanisms;</li> <li>■ Build the capacity of Subcontractors to ensure effective labour management;</li> <li>■ Collaborate with relevant stakeholders to promote positive impacts on local communities;</li> </ul>

Role	Responsibilities
	<ul style="list-style-type: none"> <li>■ 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 Voltage through quarterly E&amp;S reports during construction; and</li> <li>■ 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&amp;S reports to Voltage.</li> </ul>
<b>EPC Contractor Camp Manager</b>	<ul style="list-style-type: none"> <li>■ Collaborate with project managers and relevant stakeholders to understand the workforce size, composition, and specific needs;</li> <li>■ Plan Projects Accommodation in compliance with local regulations, and applicable international standards, including access to basic amenities and services, such as healthcare facilities, catering, and recreational areas, in accordance with established standards;</li> <li>■ Develop and implement procedures for assigning and managing accommodation for workers;</li> <li>■ Ensure that all Project workers are properly housed during the Construction phase and that the conditions of the Projects Accommodation meet all national, international and Lenders' standards;</li> <li>■ Provide an Induction/Welcoming training upon the arrival of the workers to the Project Accommodation with all relevant topics such as:               <ul style="list-style-type: none"> <li>■ Code of Conduct;</li> <li>■ Accommodation Rules;</li> <li>■ Grievance Mechanisms;</li> <li>■ Cultural integration in the Area;</li> <li>■ Welfare initiatives;</li> <li>■ Health and Safety precautions;</li> <li>■ Emergency Preparedness and Response; and</li> <li>■ Any and all other topics that will contribute to the compliance with the applicable standards and legislation and the overall wellness of the workers.</li> </ul> </li> <li>■ Coordinate with construction teams to ensure the timely and quality construction of the Projects Accommodation;</li> <li>■ Monitor Projects Accommodation compliance with safety and environmental standards during the construction phase;</li> </ul>

Role	Responsibilities
	<ul style="list-style-type: none"> <li>■ Monitor and manage occupancy rates, addressing any issues related to overcrowding or underutilization;</li> <li>■ Foster positive relationships between the workers and the local communities and authorities;</li> <li>■ Collect grievances from the Project Accommodation grievance boxes and deliver to the Social Advisor;</li> <li>■ Implement sustainable practices within the accommodation camp in compliance with the management plans from the Pollution Prevention Management Plan;</li> <li>■ Develop and enforce health and safety protocols within the Project Accommodation;</li> <li>■ Develop and implement emergency response plans for the Project Accommodation camp.</li> <li>■ Conduct regular drills to ensure workers are familiar with evacuation procedures.</li> <li>■ Prepare and submit regular reports on project Accommodation performance including, welfare, health and safety, and compliance with all applicable regulation;</li> <li>■ Provide refresher training and awareness programs for workers regarding Project Accommodation rules, code of conduct, safety measures, and emergency procedures; and,</li> <li>■ Stay updated on relevant regulations and standards related to workers accommodation, making necessary adjustments to ensure compliance.</li> </ul>
<b>All workers</b>	
<b>All construction site workers</b>	<ul style="list-style-type: none"> <li>■ Comply with all HSE requirements;</li> <li>■ Understand their responsibilities and implement the requirements of this Plan;</li> <li>■ Participate in site induction training and other relevant HSES related training if required;</li> <li>■ Report on any activities which demonstrate deviations from – or non-compliance with – this Plan requirements; and</li> <li>■ 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.</li> </ul>

For the complete list of HSES roles and responsibilities at a general project level, refer to the Voltage 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 workers' accommodation-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 workers' accommodation 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 TMP. 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
WA-1	<p><b><u>Minimisation: Workers' Accommodation</u></b></p> <p>Ensure that the accommodation provided to workers is compliant with the Guidance note by IFC and EBRD "Workers' accommodation: processes and standards."</p>	Pre-construction and during all period of construction phase	Percentage of workers provided with standardised and regulated accommodation, including an emergency and medical facility.	100%	EPC Contractor Accommodation Manager; EPC HR Coordinator; Owner HR Coordinator EPC Contractor Social Supervisor HSES Manager	<p><b><u>Monitoring activities:</u></b></p> <ul style="list-style-type: none"> <li>Conduct periodical internal audits, to ensure that the workers' living conditions comply to national and international standards, including Lenders' requirements.</li> </ul>	Monthly during the entire construction phase.	Owner / EPC Contractor / Subcontractors
			EPRP is prepared and compliant with local regulations and international standards.	100%				
			Overnight-stay accommodations are compliant with EBRD/IFC/Voltaia's minimum requirements on workers' accommodation.	100%				
			All inspections are included in the monthly HR audits during construction.	100%				
WA-2	<p><b><u>Minimisation: Release and usage of local services and resources</u></b></p>	Pre-construction and during all period of	Exceedance in usage of the four septic tanks (for construction phase).	0%	EPC Contractor Accommodation Manager;	<p><b><u>Monitoring activities:</u></b></p>	Monthly during the entire	EPC Contractor/ Subcontractors

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
	Ensure availability of food and water, the capacity of the local sewage, water distribution and waste systems.	construction phase			HSES Manager;	<ul style="list-style-type: none"> <li>Conduct periodical internal audits, to ensure that exceedances in releases or usage of local services and resources (food and water supply, local sewage, water distribution, wastewater and waste systems) do not occur during the Project construction phase.</li> </ul>	construction phase.	
			Exceedance in usage of local services and resources (food and water supply, local sewage, water distribution, wastewater and waste systems)	0%				
WA-3	<p><b><u>Minimisation: Project Grievance Mechanism</u></b></p> <p>Ensure that the Project's grievance mechanism is distributed across all Workers' accommodation.</p>	Pre-construction and during all period of construction phase	Percentage of grievance boxes distributed to selected locations within the workers' accommodation area.	100%	Accommodation Coordinator;	<p><b><u>Monitoring activities:</u></b></p> <ul style="list-style-type: none"> <li>Conduct periodical internal audits, to ensure that Exceedances in usage of local services and resources (food and water supply, local sewage, water distribution</li> </ul>	Monthly during the entire construction phase.	EPC Contractor/ Subcontractors



Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
						and waste systems) do not occur during the Project construction phase.		
WA-4	<p><b><u>Minimisation: Staffing and specific needs of the workers' accommodation</u></b> Collaborate with project managers and relevant stakeholders to understand the workforce size, composition, and specific needs</p>	Pre-construction and during all period of construction phase	Define the workforce size, composition, and specific needs for the functioning of the workers' accommodation	100%	Accommodation Coordinator; HSES Manager	<p><b><u>Monitoring activities:</u></b></p> <ul style="list-style-type: none"> <li>Conduct periodical internal audits, to ensure that Exceedances in usage of local services and resources (food and water supply, local sewage, water distribution and waste systems) do not occur during the Project construction phase.</li> </ul>	Once, at the start of the construction phase.	EPC Contractor/ Subcontractors
WA-5	<p><b><u>Minimisation: Consideration of the location criteria for the workers'</u></b></p>	Pre-construction and during all period of	Workers' accommodation is free of vector-borne diseases	100%	EPC HR Manager /	<p><b><u>Monitoring activities:</u></b></p>	Monthly during the entire construction phase.	Owner/ EPC Contractor

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
	<p><b><u>accommodation camp</u></b></p> <p>The location criteria of the workers' accommodation camp considered the following:</p> <ul style="list-style-type: none"> <li>Includes prevention measures in terms of exposure to key natural hazards (e.g., flood zones or major wadis) as well as locations that can provide habitats for potential disease vectors such as mosquitoes,</li> </ul>	construction phase	Workers' accommodation is located in an area which is safe from potential natural hazards	100%	EPC Accommodation Manager EPC HSES Manager	<ul style="list-style-type: none"> <li>Conduct periodical internal audits to ensure workers camps or accommodation are free from vector diseases and natural hazards.</li> <li>Conduct review and checks of possible exceedance from environmental limits, and regular maintenance of accommodation facilities to ensure compliance with local regulations and Project requirements.</li> </ul>	Once during planning phase / construction phase.	
Workers' accommodation is located at a reasonable distance from the Project Site			100%					
Exceedance of noise/dust/other emissions during the construction			Zero (0) occurrence					
Workers' accommodation is regularly maintained and provided with adequate rubbish collection/separation bins			100%					
Workers' accommodation meets the standards for comfort and healthy living environment.			100%					
						Monthly during the entire construction phase.		
						Monthly during the entire construction phase.		
						Monthly during the entire construction phase.		

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
	<p>flies and others (e.g., stagnant waters);</p> <ul style="list-style-type: none"> <li>■ Located at a reasonable distance from the construction site to avoid impacts of noise, dust and other emissions;</li> <li>■ Acquiring adequate materials with sufficient maintenance (kept in good repair, clean and free from rubbish and other refuse); and,</li> </ul>							

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
	<ul style="list-style-type: none"> <li>Includes heating, air-conditioning and ventilation, which is appropriate for the climatic conditions and provide workers with a comfortable and healthy environment.</li> </ul>							

## 5.0 RISK MANAGEMENT

To safeguard the well-being of employees, the protection of the environmental and social components, and overall business sustainability applicable to Project Accommodation, both the Site Management Team and Contractors are required to adopt a risk management approach. This approach involves identifying hazards and any negative impacts that could affect Project Accommodation during the construction phase by 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

These risk assessments must be performed at the following stages:

- Before the commencement of activities;
- Prior to introducing new equipment, procedures, or processes; and
- When there are 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 Votalia’s HSES Management Plan); and
- Direct and Indirect Social Aspects Matrix (refer to **Appendix H – Risk Assessment Matrix – Social Aspects** of the Votalia’s HSES Management Plan).

The preparation of the Risk Assessment documents will follow the methodology specified in the Votalia **Occupational Risk Evaluation and Environmental Aspects Evaluation Procedures** (accessible in the Votalia Intranet on the HSE HUB).

### 5.1.2 Project Accommodation Risk Assessment

In addition, for any Project workers’ accommodation-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 Votalia’s HSES Management Plan. This will be submitted for review to the HSE Technician and the Workers Camp Coordinator no later than a week prior to starting the activities described in the work method statement.

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 **Votalia’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 are found in Section 7.1 of the Votalia’s HSES Management Plan. This list is not exhaustive, and any other high-risk activity identified should be subject of a PTW.

PTWs must be requested before commencement of any High-Risk activity (**refer to Appendix J – Permit to Work Request** of the Votalia’s HSES Management Plan). The requestor shall apply for a PTW of any High-Risk Activities undertaken within their area of supervision.

### 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, Voltalia will implement an interface management process, 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. More information about the implementation procedures is found in **Section 5.4.4 of the Voltalia's HSES Management Plan**.

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 of responsibility of the Site Management Team / HSES Manager. More information about the implementation procedures is found in Section 5.4.5 of the Voltalia's HSES Management Plan.

## 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 its re-occurrence following the **Voltalia Incident Management Procedure** and **Section 5.6 of the Voltalia's HSES Management Plan**. 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 to identify where management controls failed and recommendations to identify new or restore controls are implemented.

Early sharing of learning's shall be carried out to facilitate prompt corrective and preventive actions where similar situations are found to prevent a recurrence both locally and at other locations.

## 7.0 AUDIT AND REVIEW

The correct implementation of this Plan is verified through internal inspections and audits a. The schedule, the frequency, the scope and objectives of the audit as well as the responsible internal auditors shall be selected on the basis of

Internal auditing shall address:

- the correct implementation of all applicable standards (Uzbek regulatory framework, IFC PSs, EBRD PRs, WBG General EHS Guidelines and other applicable guidelines depending on the topic);
- the correct implementation of this Management Plan by the Site Management Team, Contractors and Subcontractors;
- the development and timely implementation of an auditing and review system by the Site Management team and Contractors; and
- the implementation of the points indicated in the table in section 0 (mitigation measures/actions and monitoring activities) of this Plan;

Evidence and results of the inspection and audit activities shall be included in the audit reports, in the "Non-Conformity and Preventive/Corrective actions" Action Trackers, and in the HSE performance report for Management review, as expressed in **Section 10.6. of the Voltalia HSES Monitoring Plan** (Monitoring and Measurement of HSE Performance).

Voltalia's HSE Manager will review results of inspections and audits and the progress of the implementation of any Preventive/Corrective actions; if necessary, additional appropriate actions will be taken according to the indications included in Preventive Instructions List – **Appendix P of the HSES management Plan**.

Additional details related to the construction phase of the Project are expected in due course; therefore, this Plan shall be subject to a systematic review process during the construction phase in order to encompass and consider any information relevant to workers' accommodation matters. This Plan will be reviewed either once a

year or based on the occurrence of significant changes in the workers' accommodation related activities (whichever happens sooner). Revision of this WAMP 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 EPC Contractor, which shall be reflected in the Subcontractors' WAMP, ensuring that their training activities are carried out in compliance with this Plan.

### 8.1 Healthy Living and Housekeeping Training

EPC Contractor Camp Manager shall ensure all workers attended a Healthy Living and Housekeeping Training that covers the following aspects:

- Worker Camp Rules and Regulation;
- Common Rules;
- Housekeeping and Hygiene Rules;
- Behaviour among workers;
- Community, Harassment, Gender Based Violence and Child Abuse/Exploitation
- Alcohol Consumption;
- Illegal Substances; and,
- Sexual Activity and Services.

### 8.2 Specific Training

HSE training shall be provided to ensure that all workers staying in the workers' accommodation including staff and workforce (working to support the workers' accommodation), are prepared for the specific hazards of individual work assignments. Proof of competence and appropriate works plans, including risk assessments, are to be sent in prior to the works for the approval of these in accordance with the next Appendices from the HSES Management Plan:

- Induction Training – Construction – PV - Appendix K;
- Induction Training Record - Appendix L;

An example of a specific training is training on emergency preparedness and response, which shall be provided to all workers staying in Project Accommodation. Training can include (but not limiting to):

- Site Induction Training
- Toolbox talks
- Specific training relevant to support and maintain the workers' accommodation

Should the HSE performance monitoring results (such as promoting the integration of HSE culture and responsibilities across all the organization structure) demonstrate that a reinforcement is required, further site awareness on workers' accommodation management shall be provided to all workers (incl. signage, markings, labelling, etc.) and customized on the basis of the types of incidents /near misses or KPIs recorded

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 project Accommodation 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 WAMP.
- 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 WAMP;
- Suggestions for future projects based on lessons learned;
- Quality control procedures applied to ensure consistency and reliability of the analyses or results;
- Approvals and certificates issued by the relevant agencies (where applicable).
- Summary of any worker' accommodation-related 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 HSES MP and Voltaia's **E&S Management System** and section 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 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 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.