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HSE DEPARTMENT: TRAFFIC MANAGEMENT PLAN

FUNCTIONS INVOLVED BY THE PROCEDURE:

HEALTH, SAFETY & ENVIRONMENT DEPARTMENT

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FIGURES

Figure 1: Project Region. Source: NBT, 2023.6
 Figure 2: Project area and surroundings. Source: NBT, 2023.7

Acronyms and Abbreviations

EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health and Safety
EPC	Engineering, Procurement and Construction
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
ID	Identification code
IFC	International Finance Corporation
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

1.0 INTRODUCTION

This document is the Traffic Management Plan (TMP) 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 traffic aspects. This Plan sets the principles according to which traffic 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) and World Bank Group (WBG) General Environmental, Health and Safety (EHS) Guidelines.

1.1 Purpose and Scope

The main purpose of this document is to develop and implement plans and procedures to integrate the environmental, health, safety and social aspects related to the labour and working conditions within the overall Project management framework that will be implemented throughout the Project construction phase. The document provides the guidelines for the Engineering Procurement and Construction (EPC) Contractor, Contractors and Subcontractors to address the labour aspects according to the national and international standards mentioned above.

The scope of this Plan includes the following elements:

- Project's standards for managing the labour aspects during the construction phase;
- Responsibilities, commitments, operating procedures and instructions for the implementation of this Plan;
- Mitigation measures applicable to the Project in relation to the labour aspects. A mitigation hierarchy will be adopted to anticipate and avoid, or where avoidance is not possible, minimize and restore impacts on the environment.
- Guidelines for the monitoring activities and the management of their performance;
- The identification of actions to measure the performance of monitoring activities; and,

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

- Community Health, Safety and Security (CHSS) Management Plan;
- Occupational Health and Safety (OHS) Management Plan;
- Environmental, Social, Health and Safety Management Plan (ESHS MP);
- Emergency, Preparedness & Response Plan (EPRP);
- Air Quality Management Plan (AQMP);
- Noise Management Plan (NMP);
- Waste and Hazardous Materials Management Plan (WHMMP);
- Water and Energy Sources Management Plan (WESMP)

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.

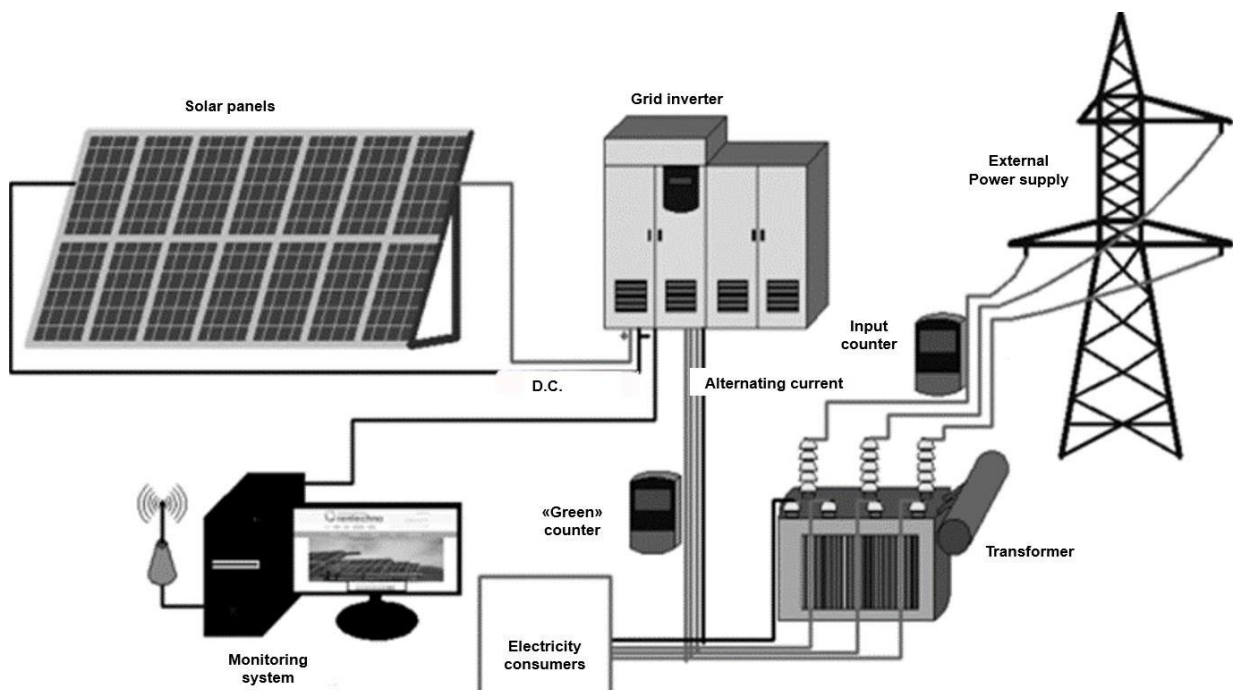


Figure 1: Schematic diagram of a solar photovoltaic power plant operation

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.

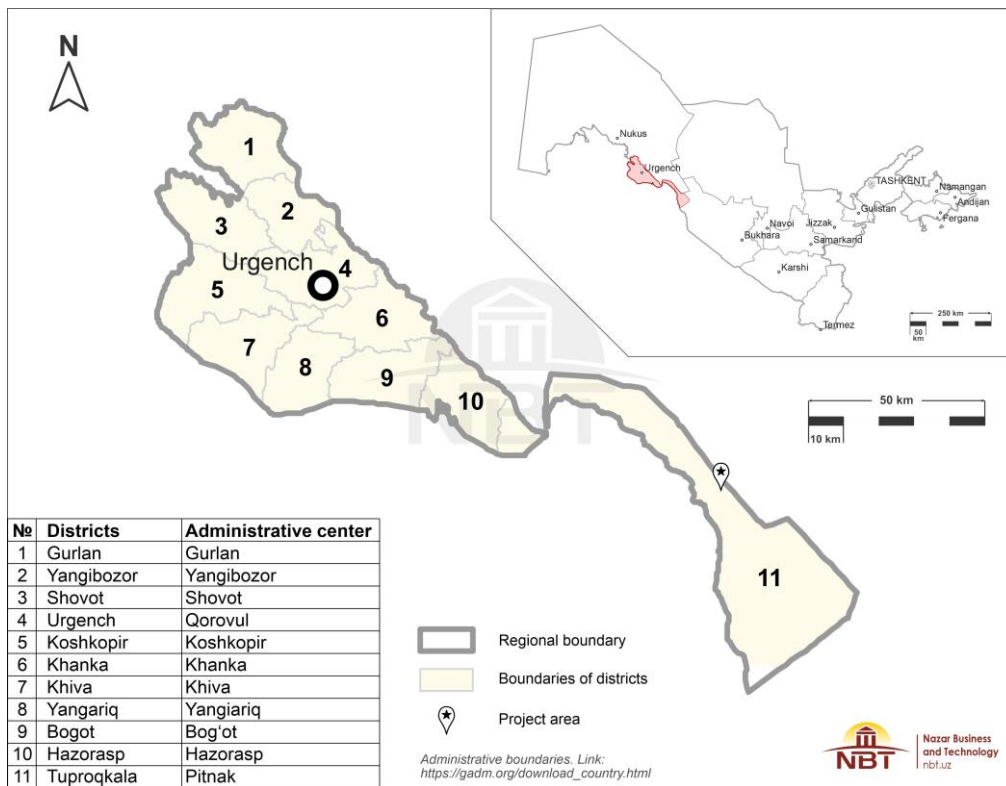


Figure 2: Project Region. Source: NBT, 2023.

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 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.

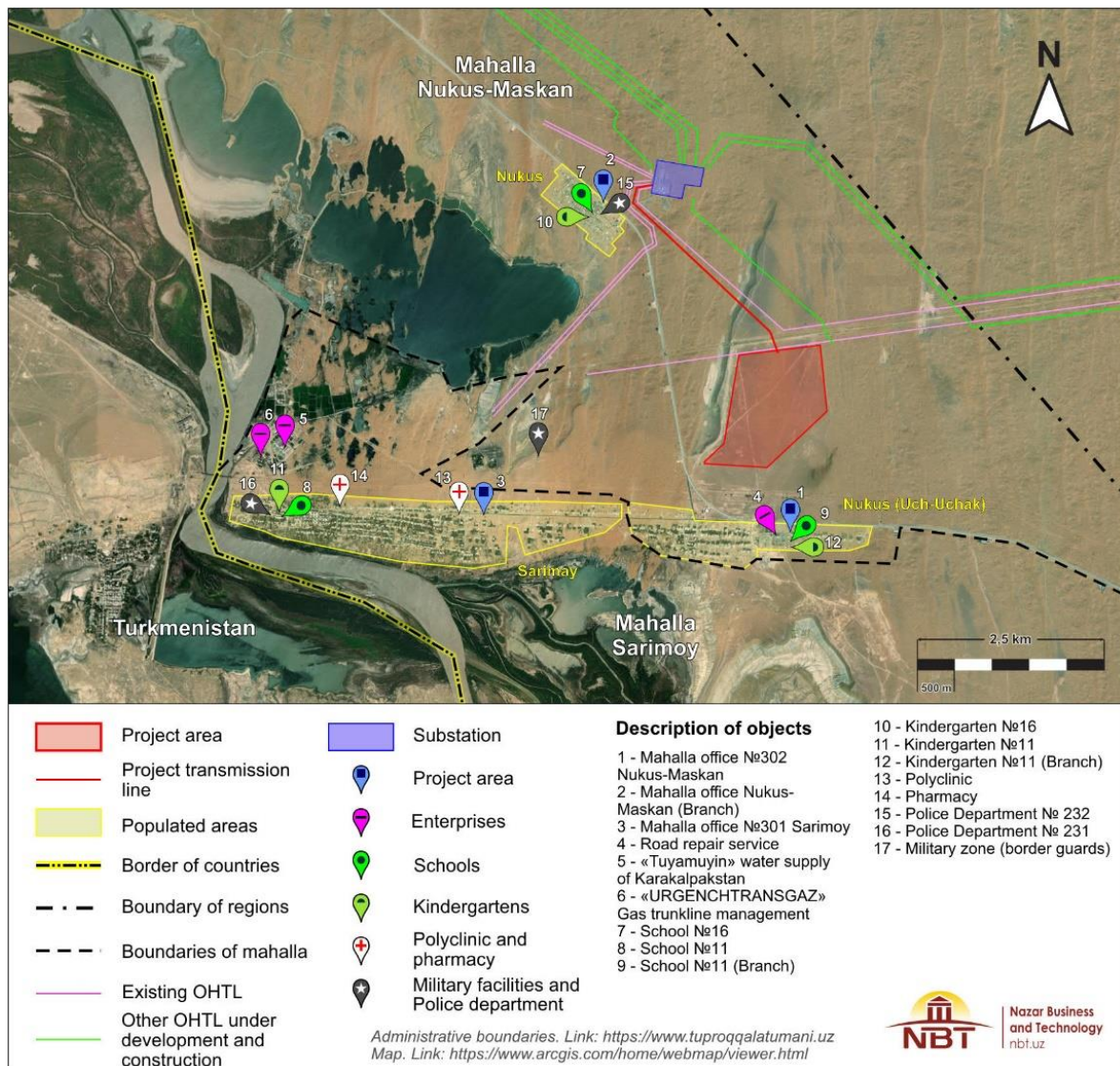


Figure 3: Project area and surroundings. Source: NBT, 2023.

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;
- Excavation of trenches for the laying of cables;
- Concrete pouring under the foundation of buildings and structures;
- Performance tests;
- Building of sewage septic tank and firefighting water tank;
- Site clean-up and demobilization activities;

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

During the operation the 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 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 Traffic Needs and Effects

Based on the “Social Components Impact assessment” (ESIA Section 08C), the Project will generate traffic of heavy and light vehicles due to the need to transport goods, materials and staff to the Site. The main road for vehicles to transport materials and wastes is the A380 national road. Access to the Project area from the A380 national road has been discussed with the competent authorities and no specific road safety measures have been deemed to be necessary at this stage.

The increased traffic can lead to potential accidents involving persons or vehicles, including fatal incidents. As mentioned, the A380 road will be used, which is a national highway and is designed to be used by heavy vehicles and includes a series of safety measures, compared to other local roads.

In addition, the increase of traffic that will be generated by the Project will be limited compared to the traffic that normally occurs on those roads. The Project induced traffic is therefore not expected to generate increased congestions, considering that the A380 road can accommodate significant flows of traffic.

The A380 road is a national road and is not used for local traffic, as the settlements have their own internal roads. It is however used to connect Sarimay and Nukus maskani, and to connect them with the rest of the region and of the country. The additional traffic is not expected to affect significantly the two local communities.

This Plan will be developed to identify the specific mitigation measures and ensure that the traffic situation is monitored throughout the construction phase.

The Site Management Team and Contractors shall ensure that the access routes, pedestrian cross points, materials storage areas and movement of vehicles/equipment's are adequately controlled and properly managed within the Project premise and on public roads. Arrangements for the Project traffic management shall comply with the following Project Traffic Minimum Requirements (PTMRs):

- Traffic routes in a workplace shall be suitable for the persons or vehicles using them. This shall be sufficient in number and of sufficient size. This shall reflect the suitability of traffic routes for vehicles and pedestrians.
- Where vehicles and pedestrians use the same traffic routes there shall be sufficient space between them.
- Where necessary, all traffic routes must be suitably indicated. Pedestrians or vehicles must be able to use traffic routes without endangering those at work. There must be sufficient separation of traffic routes from doors, gates, and pedestrian traffic routes.
- For internal traffic, lines marked on roads / access routes and between buildings shall clearly indicate where vehicles are to pass.
- Temporary obstacles shall be brought to the attention of drivers by warning signs or hazard cones.
- Speed limits shall be clearly displayed. Speed ramps preceded by warning signs or markers are necessary.
- The traffic route should be wide enough to allow vehicles to pass and re-pass oncoming or parked traffic and it may be advisable to introduce a one-way system or parking restrictions.
- The safest route shall be provided between places where vehicles must call or deliver.
- Avoid vulnerable areas/items such as fuel or chemicals tanks or pipes, open or unprotected edges and structures likely to collapse.
- Safe areas shall be provided for loading and unloading.
- Avoid sharp or blind bends. If this is not possible hazards should be indicated e.g., blind corner.
- Ensure road crossings are minimum and clearly signposted.
- Entrance and gateways shall be wide enough to accommodate a second vehicle without causing obstruction.
- Set sensible speed limits which are clearly sign posted.
- Where necessary ramps should be used to retard speed. This shall be preceded by a warning sign or mark on the road.
- Forklift trucks shall not pass over road hump unless of a type capable of doing so.
- Overhead electric cable, pipes containing flammable hazardous chemical shall be shielded by using goal posts height gauge posts or barriers.
- Road traffic signs shall be provided on prominent locations for prevention of incidents and hazards and for quick guidance and warning to employees and public. Safety signs shall be displayed as per the project working requirement and guideline of the state in which the project is done. Vehicles hired or used shall not be parked within the 15m radius of any working area. Any vehicle that is required to be at the immediate/near the vicinity, shall be approved by the person in-charge of the site.
- Where traffic routes are used by both pedestrians and vehicles, the road shall be wide enough to allow vehicles and pedestrians safely.
- Separate routes shall be provided for pedestrians to keep them away from vehicles. Provide suitable barriers/guards at entrances/exit and the corners or buildings.

- Where pedestrian and vehicle routes cross, appropriate crossings shall be provided.
- Where a crowd is likely to use the roadway e.g., at the end of shift, stop vehicles from using them at such times.

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;
- 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 Ministry of Transportation is responsible for all transport related activities and their requirements should be fully complied with in terms of routing of Heavy Goods Vehicles (HGVs), site vehicles, licensing, road diversions, heavy/wide loads etc. Some of the relevant national requirements for the Project include:

- Law "On Road Traffic Safety" of the Republic of Uzbekistan August 19, 1999, No. 818-I (as amended on 29-12-2015): The main objective of this law is to ensure protection of life and health of citizens.
- Annex No.2 to the Decree of Cabinet of Ministers No. 342 of December 26, 2011, on the regulations on road safety during transportation of large and heavy loads by road transport: this law determines the requirements of ensuring and coordinating traffic safety during the transportation of large size and heavy loads on public roads in the territory of Uzbekistan. It also details the basic requirements for the technical condition equipment and furnishing of vehicles used for the transport of large and heavy loads as well as safety.
- Criteria and Procedure for Determining International Road Transportation of Loads (approved by the Decree of Ministry of Transport of the Republic of Uzbekistan and State Customs Committee of the Republic of Uzbekistan dated October 31, 2019, No. 6).
- Regulations on transportation of loads by road in the Republic of Uzbekistan (Annex to Decree of Cabinet of Ministers No. 213 of 01.08.2014).

Moreover, Uzbekistan has enacted the following law:

- O'z DSt 1057:2004 - Vehicles. Safety requirements for technical conditions.

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 PS4 and IFC GN4 – Community Health, Safety, and Security;
 - b. Within Guidance Note 4, the following specific GNs are relevant: GN5, GN11.
- ii) EBRD Performance Requirements (PR) (2019), in particular:
 - a. EBRD PR 4 on Health and Safety, which establishes management requirements with regards to traffic and road safety risks to workers and potentially affected communities;
- iii) World Bank IFC General and Sector-Specific EHS Guidelines, more specifically:
 - a. Section 3 – Community Health and Safety 3.4, more specifically sub-section 3.4 – Traffic Safety;

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
Volitalia	
Project Director	<ul style="list-style-type: none"> ■ Ensure the Volitalia’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	<ul style="list-style-type: none"> ■ 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; ■ 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	<ul style="list-style-type: none"> ■ 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;

Role	Responsibilities
	<ul style="list-style-type: none"> ■ 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; ■ 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.
<p>Volitalia - Site Manager</p>	<ul style="list-style-type: none"> ■ 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.
<p>HSE Coordinator</p>	<ul style="list-style-type: none"> ■ Implementation of the HSE Policies, Sustainability principles, procedures and

Role	Responsibilities
	<p>best practices, transversely to Voltalia region;</p> <ul style="list-style-type: none"> ■ 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;
EPC Contractor - Site Management Team	
Project Manager	<ul style="list-style-type: none"> ■ 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 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	<ul style="list-style-type: none"> ■ 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; ■ Provide to Voltalia's Health and Safety Site Supervisor, before the start of any hazardous work, the Environmental Risk Assessment and Method Statement –

Role	Responsibilities
	<p>RAMS;</p> <ul style="list-style-type: none"> ■ 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.
<p>HSES Manager</p>	<ul style="list-style-type: none"> ■ 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; ■ 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

Role	Responsibilities
	<p>implementation of this Plan and of HSE specialist(s) tasks;</p> <ul style="list-style-type: none"> ■ 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; ■ 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.
<p>Health & Safety Site Supervisor</p>	<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"> ■ 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; ■ 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.
<p>E&S specialist</p>	<ul style="list-style-type: none"> ■ 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

Role	Responsibilities
	<p>environmental management are implemented;</p> <ul style="list-style-type: none"> ■ 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;
<p>HR Coordinator</p>	<ul style="list-style-type: none"> ■ 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

Role	Responsibilities
	<p>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.</p>
<p>Traffic Coordinator</p>	<ul style="list-style-type: none"> ■ Ensure the correct implementation of this Plan during the construction phase; ■ Manage traffic during the construction phase ensuring that all vehicle movements are coordinated to avoid congestion on the road and maintaining safety for workers and the communities; ■ Act as point of contact for any traffic related issues arising during the construction phase.
<p>All workers</p>	
<p>All construction site workers</p>	<ul style="list-style-type: none"> ■ 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 Voltalia’s 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 traffic-related activities during the 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 traffic 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 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
Traffic-1	<p><u>Minimization: MP dissemination</u></p> <ul style="list-style-type: none"> The TMP will be disseminated to all staff responsible for managing the construction site and to all sub-contractors working on the Project. 	Pre-construction and during all period of construction phase	TMP disseminated to EPC Contractor/Subcontractors	TMP provided to all EPC Contractors and Subcontractors	EPC Contractor HSES Manager EPC Contractor Traffic Coordinator	<p><u>Monitoring activities:</u></p> <ul style="list-style-type: none"> Conduct periodical internal audits, to ensure that the plan is known at all levels of the organization and implemented; Keep the records of the internal audits. 	Monthly during the construction phase and upon the hiring of any worker that will participate in traffic management activities.	EPC Contractor E&S Specialist
			All road signs are installed within the Project Area	100%				
			All road signs installed are regularly maintained and checked	100%				
Traffic-2	<p><u>Minimization: employees' awareness and training</u></p> <ul style="list-style-type: none"> All personnel will be trained in proper traffic management, taking into consideration their level of responsibility and duties; All drivers accessing the site will be briefed and trained about the speed restrictions. 	Pre-construction and during all period of construction phase	All Project workers are properly trained in traffic management (including road signs)	100%	EPC Contractor HSES Manager EPC Contractor Traffic Coordinator	<p><u>Monitoring activities:</u></p> <ul style="list-style-type: none"> Verify that workers have been trained about mitigation and monitoring measures. Keep on-site a detailed training register. Keep the records of employees trained in traffic management and make them available for review. Carry out regular inspection and maintenance of traffic signs and road structures (e.g., speed bumps, ramps etc.) 	Monthly during the construction phase	EPC Contractor E&S Specialist
			All trained workers have passed Project traffic test	100%				
			Cases of road accidents during construction phase	Zero (0) occurrence				
Traffic-3	<p><u>Avoidance: Promoting safe driving and eliminating unsafe/irresponsible driving/behaviour</u></p> <ul style="list-style-type: none"> Signs and labels showing the maximum speed allowed will be affixed at the site entrances and on the Project area roads. If necessary, install speed bumps and noise stripes on straight sections of the access and internal roads. Any unsafe or irresponsible actions will be identified, corrected, and reported to HSE 	Pre-construction and during all period of construction phase. Pre-construction and during construction phase	All traffic signs are properly installed including speed limits	100%	EPC Contractor HSES Manager EPC Contractor Traffic Coordinator	<p><u>Monitoring activities:</u></p> <ul style="list-style-type: none"> Verify that workers have been trained about mitigation and monitoring measures. Keep on-site a detailed training register. Keep the records of employees trained in traffic management and make them available for review. Verify that good catches have been recorded and addressed (workers redoing traffic trainings and tests to showcase compliance 	Monthly during the entire construction phase	EPC Contractor E&S Specialist
			Frequency of non-compliance with road traffic rules	Zero (0) occurrence				
			Good catch reports updated during the construction phase	100%				

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
	department.							
Traffic-4	<p><u>Minimization: Safety equipment vehicles</u></p> <ul style="list-style-type: none"> Ensure that vehicles are equipped with all safety devices such as seat belts, mirrors, safety signals etc. 	Pre-construction and during all period of construction phase	Records of vehicle/equipment maintenance during construction phase	All vehicles went through regular maintenance according to the licensors' requirements	EPC Contractor HSES Manager EPC Contractor Traffic Coordinator	<p><u>Monitoring activities:</u></p> <ul style="list-style-type: none"> Verify that vehicles and equipment are well maintained to ensure proper mitigation and monitoring measures. 	Quarterly during the entire construction phase	EPC Contractor E&S Specialist
Traffic-5	<p><u>Minimization: Monitoring of traffic related accidents</u></p> <ul style="list-style-type: none"> Verify and register of all traffic related incidents and periodically revise road safety measures based on lessons learned. 	Pre-construction and during all period of construction phase	Records traffic related accidents during construction phase are updated	100%	EPC Contractor HSES Manager EPC Contractor Traffic Coordinator	<p><u>Monitoring activities:</u></p> <ul style="list-style-type: none"> Verify that traffic related accidents have been address/recorded as mitigation and monitoring measures. Keep on-site a detailed register of the traffic related accidents involving Project workers/vehicles. Keep the records of employees traffic related accidents, lessons learned including revised road safety measures, and make them available for review. 	Continuous throughout the entire construction phase	EPC Contractor E&S Specialist
			Road safety measures including lessons learned have been periodically updated or revised as required.	100%				
Traffic-6	<p><u>Minimization: Traffic awareness campaigns</u></p> <ul style="list-style-type: none"> Perform traffic safety awareness campaigns targeted at local communities and vulnerable groups, such as children and elderly, which may be increasingly involved in road accidents. 	Pre-construction and during all period of construction phase	Records traffic awareness campaign conducted for local communities/workers during the construction phase updated	Local communities and vulnerable groups correctly informed.	EPC Contractor HSES Manager EPC Contractor Traffic Coordinator	<p><u>Monitoring activities:</u></p> <ul style="list-style-type: none"> Verify that traffic awareness campaigns have been conducted and posters distributed as part of the mitigation and monitoring measures. Keep on-site a detailed register of the traffic awareness campaigns development. Keep the records of traffic awareness campaigns and make them available for review. 	Quarterly throughout the entire construction phase	EPC Contractor E&S Specialist
Traffic-7	<p><u>Minimization: Stakeholder engagement</u></p> <p>Engage stakeholders on potential impacts due to Project activities and planned mitigation measures throughout the Project. The</p>	Pre-construction and during all period of construction phase	Engagement with the relevant stakeholders on Project related traffic impacts and mitigation measures	All project related traffic issues and mitigation measures have been communicated to the relevant stakeholders (100%)	EPC Contractor HSES Manager EPC Contractor Traffic Coordinator	<p><u>Monitoring activities:</u></p> <ul style="list-style-type: none"> Verify that traffic related issues and mitigation measures have been communicated to the relevant stakeholders as part of the mitigation and monitoring 	Continuous throughout 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
	engagement activities will be carried out in transparent, culturally accessible way and ensuring the inclusion of vulnerable groups, in line with the Stakeholder Engagement Plan prepared for the Project. In particular local communities will be informed about activities and tasks that may impact local traffic and mitigation measures will be agreed with local authorities.					measures. <ul style="list-style-type: none"> Keep on-site a detailed register of the communications with the relevant stakeholders including the authorities. Keep the records of communication with stakeholders and make them available for review. 		
Traffic-8	<p><u>Minimization: Grievance Mechanism</u></p> <p>Ensure the implementation of a Grievance Mechanism for individuals and groups to formally communicate their concerns, complaints and grievances to the company and facilitate resolutions that are mutually acceptable by the parties in a timely and effective manner.</p>	Pre-construction and during all period of construction phase	IGM/EGM are correctly adopted/implemented for processing any grievances during the construction phase	Grievance channels open and operational at (100%) All grievances resolved according to the defined timeframe (100%).	EPC Contractor HSES Manager EPC Contractor Traffic Coordinator	<p><u>Monitoring activities:</u></p> <ul style="list-style-type: none"> Verify that traffic IGM/EGM for traffic is set up and ready for use as part of the mitigation and monitoring measures. Keep on-site a detailed register of the traffic related grievances. Keep the records of grievances relevant to traffic and make them available for review. 	Continuous throughout the entire construction phase	EPC Contractor E&S Specialist
Traffic-9	<p><u>Minimization: Permits and authorizations:</u></p> <p>Obtain and maintain all necessary environmental, social and health & safety permits and authorizations required for the Project. Hold a dedicated register of these permits and authorizations, indicating their scope and validity date if any.</p>	Pre-construction and during all period of construction phase	Obtain and maintain all necessary environmental, social and health & safety permits and authorizations required for the Project A dedicated register of all permits and authorizations relevant to traffic management is kept (indicating their scope and validity date if any).	100% 100% Zero (0) occurrence	EPC Contractor Traffic Coordinator ESAP Owner Owner ESAP Manager	<p><u>Monitoring activities:</u></p> <ul style="list-style-type: none"> Register of permits and authorizations available and regularly updated. All permits and authorizations obtained and maintained. 	Continuous throughout the entire construction phase	EPC Contractor E&S Specialist
Traffic-10	<p><u>Register of E&S commitments:</u></p> <p>Prepare a register of all E&S commitments from the permitted EIA, ESIA and ESAP actions. Define</p>	Pre-construction and during all period of construction phase	A register of E&S commitments relevant to traffic management is	100% of all E&S commitments listed and complied with.	Owner E&S Advisor	<p><u>Monitoring activities:</u></p> <ul style="list-style-type: none"> E&S actions defined in the EIA, 	Continuous throughout 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
	success/fail indicators for all actions so that they can be readily monitored. Integrate them in a comprehensive E&S Management and Monitoring Plan. Allocate their implementation responsibility to the SPV or to the EPC Contractor(s). Require, in a contractually binding manner, the Contractor(s) to implement the E&S commitments of the register that fall under its responsibility. Provide a detailed implementation plan for all E&S commitments of the register that fall under Voltalia's responsibility. The plan must be submitted to EBRD's non-objection prior to mobilization.		fully developed and implemented.			ESIA and in the ESAP assigned to SPV or to the EPC in a contractually binding manner. <ul style="list-style-type: none"> Register of E&S commitments, implementation responsibility allocation and success/fail criteria communicated to EBRD. 	Once - When finalizing the E&S terms of the EPC contract	EPC Contractor E&S Specialist
All necessary ESHS permits and authorizations required for the Project			All the necessary (100%) ESHS permits have been identified.	Owner E&S Advisor				
Records of non-compliance with the E&S commitment			Zero (0) occurrence	EPC Contractor Traffic Coordinator Owner E&S Advisor				
Traffic-11	<p><u>Minimization: Compliance with the general traffic rules during construction:</u></p> <p>Ensure that:</p> <ul style="list-style-type: none"> Access routes, pedestrian cross points, materials storage areas and how movement of vehicles/equipment's are adequately controlled and properly managed within project premise and on public roads. Arrangements for the project traffic management shall comply with the minimum requirements for the Project Traffic Minimum Requirements (PTMRs) as reported in section 1.3.1. 	Pre-construction and during all period of construction phase	The Project's traffic rules are properly implemented and in compliance with the minimum traffic	100%	EPC Contractor Traffic Coordinator Owner HSE Coordinator EPC Contractor HSES Manager Owner E&S Advisor	<p><u>Monitoring activities:</u></p> <ul style="list-style-type: none"> Owner ESAP to monitor EPC Contractor's general traffic rules implementation throughout the construction phase. Register of non-compliance (including good catches) with traffic rules during construction. 	Once - When finalizing the E&S terms of the EPC contract	EPC Contractor E&S Specialist
Traffic rules is broken during the Project's construction phase	Zero (0) occurrence							
Promote good catch (all good catches and incidents that cause or have the potential to cause personal injury or damage to property or the environment) throughout the construction phase	100%							
Traffic-12	<u>Avoid delivery and other traffic during night time</u>	During all period of construction phase	The Project's traffic rules are properly implemented and in compliance with the minimum traffic	100%	Owner HSE Site Supervisor EPC Contractor HSES Manager	<p><u>Monitoring activities:</u></p> <p>Make sure delivery of goods during daytime performed only by logistics companies or suppliers.</p>	Once - When finalizing the E&S terms of the EPC contract	EPC Contractor HSES manager and Procurement manager
Traffic-13	<u>Ensure that regular transportation provided free of charge to workers</u>	During all period of	The Project's Accommodation	100%	Owner E&S advisor	<p><u>Monitoring activities:</u></p>	Once - When finalizing the E&S	EPC Contractor E&S Specialist and HSES

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
	<u>from workers accommodation to work sites and neighbouring villages</u>	construction phase	management Plan rules are properly implemented and in compliance with the accommodation management plan requirements		EPC Contractor HSES Manager, E&S Advisor	Implementation of transportation of workers from accommodation to site and from site to accommodation to be monitored time to time in weekly basis.	terms of the EPC contract	manager

5.0 RISK MANAGEMENT

To safeguard the well-being of employees, protection of the environment, and overall business sustainability, both the Site Management Team and Contractors are required to adopt a risk management approach. This approach involves identifying 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:

- Before the commencement of activities.
- Prior to introducing new equipment, procedures, or processes.
- When there are modifications made to existing equipment, procedures, or processes.

The Site Management Team will be responsible for preparing an overarching and high-level risk assessment for the Project before the site mobilization begins. 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 (accessible in the Voltalia Intranet on the HSE HUB).

5.1.2 Risk Assessment and Method Statement (RAMS)

In addition, for any Project traffic-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. This will be submitted for review to the HSE Technician and the Site Manager 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 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 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 of a PTW.

PTWs must be requested before commencement of any High-Risk activity (**refer to Appendix J – Permit to Work Request** of the Voltalia'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. Voltalia has an Incident Management Procedure accessible in Voltalia's Intranet on the HSE HUB. 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 learning's to facilitate prompt corrective and preventive actions where similar situations are found 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 Voltalia's HSES Management Plan.

7.0 AUDIT AND REVIEW

The correct implementation of this Plan is verified through internal inspections and audits. 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 Section 10.2. of Voltalia's HSES Monitoring Plan (Monitoring and Measurement of HSE Performance).

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 and audit activities shall be included in the audit reports and in the "Non-Conformity and Preventive/Corrective actions" records, and in the HSE performance report for

Management review, as expressed in Section 4.1. of Voltalia's 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; it is therefore recommended that this Plan is subject to a systematic review process during the construction phase in order to encompass and consider any information relevant to traffic 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 traffic 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 HSES Induction

The EPC Contractor, through the HSE Manager and the EPC Contractor Management, will be responsible for providing to all workers involved in the construction activities, including staff and workforce of Sub-Contractors, an induction (presentation or video) before the commencement of any activity at the working site, as well as a copy of the Voltalia HSES Management Plan. Attendance at HSE safety 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 induction information. 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.

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

- 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;
- PPEs to be used: helmet, mask, vest, safety shoes, etc.
- 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 Traffic, such as:
 - Staying within cordoned pedestrian lanes;
 - Speed limits on roads and on-site;
 - Community awareness and cautioning;
 - If applicable the need to always stay seated in your bus seat with seatbelt fastened;
- The workers responsibility to ensure mitigation measures all properly applied by all workers and drivers;
- Delimitation of Rest areas for drivers;

- Absolute “do nots” for the Project (drugs, weapons, sexual harassment, discuss religion).

After the Induction training, all workers and visitors will be provided a HSE card with the summary of the mandatory PPEs and emergency information following the templated provided by Badges - Appendix E of the HSES Management Plan. The HSE card shall be returned at the end of the work/visit.

Visitors will be asked to fulfil an internal questionnaire as presented in **HSE Safety Tour - Appendix F of the Voltalia HSES Management Plan**, providing them the objective, instructions for fulfil and access to the DB (QR code).

Should there be any substantial changes in the Project activities related to traffic, 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. 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 dust and air emission management, which shall be provided to workers involved in earthworks and soil/aggregate stockpiling, waste management operators, generator operators and drivers. Training can include (but not limiting to):

- Use of the specific vehicle type to be used by driver;
- Defensive driving / driving practices that reduce the risk of accidents, including driving within speed limits;
- Driving practices that reduce fuel consumption, including measured acceleration;
- Drivers’ awareness, specifically in regard to the potential safety concerns relating to vulnerable users of the road and pedestrians;
- Driving techniques applicable to specific loads (e.g., Hazardous substances);
- Knowledge of air and dust emission sources and risks associated;
- Measures for minimization of air and dust emission;
- Correct use and application of PPE and clothing; and
- Appropriate response to emergency conditions, incidents and accidents.

Should the HSE performance monitoring results (such as recurrent incidents or near misses related to traffic) demonstrate that a reinforcement is required, further site awareness on Traffic 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

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 TMP.
- 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 Traffic Management Plan;
- 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 traffic-related incidents or accidents;
- Analysis of the root causes and lessons learned, and documentation of any corrective actions taken;
- Monitoring reports shall include:
 - Traffic Flow and Patterns;
 - Signage and Road Markings; and,
 - Communication and Coordination of Traffic during Construction.

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 7.0 "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; and
- Description of non-compliances eventually identified; and,
- Description of correction measures to be applied.

9.3 Incident and good-catch reporting

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. The reporting shall follow the methodology as explained in the Voltalia HSES Management Plan "**Good-Catches and Incident Registry**" – **Appendix U** and also following the form available in: "**Accident & Incident Immediate Report – Four Blocker**" – **Appendix V**, for the immediate registry of an incident.

Investigations into health, safety and environment incidents shall be conducted by Voltalia HSE department personnel or in the case of a significant event a special Lead Investigator shall be appointed by Senior Management. The process is described as follows:

- The initial investigation (fact finding and interviews) should be completed within 24 hours of the accident.
- Root Cause Investigation methods should be used to identify the causal factors of the incident and associated root causes.
- The Event Investigation Report should identify root causes to the event and recommended corrective actions that are designed to prevent re-occurrence.
- A copy of the Incident Investigation Report shall be kept on file at the Site or in an online platform accessible on site. A signed copy of the final report must be made available to Voltalia's HSE department personnel for regulatory reporting, workers' compensation, and trend analysis purposes. This will apply to health, safety, and environment incidents.
- Additionally, all lost time injury, medical treatment injuries first aid injuries, must also be notified to the Site Owner within 24 hours of the incident occurring. Further within 2 business days of the injury an interim report must be made to the Site Owner, which gives full details of the injury and interim recommendations for prevention of a recurrence. Finally, within 5 business days of the injury, a final full written report must be sent, which gives complete details of the injury and formal recommendations for prevention of a recurrence.