



*Labour Management Plan (LMP) - Construction Phase*

HSE-PLN-010-01-UZ-S-KHE01-EN

*Khorzem Solar 100MW | Uzbekistan*



## Record of Issue

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# Table of Contents

1.0	INTRODUCTION .....	6
1.1	Purpose and Scope.....	6
1.2	Relationship with other Management Plans.....	7
1.3	Project Overview .....	7
1.3.1	Project Labour Needs and Effects	11
2.0	REFERENCE & LEGAL REQUIREMENTS .....	14
2.1	National Requirements.....	15
2.2	International Standards .....	16
3.0	ROLES AND RESPONSIBILITIES.....	17
4.0	MITIGATION MEASURES/ACTIONS AND MONITORING ACTIVITIES .....	25
5.0	RISK MANAGEMENT .....	40
5.1.1	Risk Assessment	40
6.0	AUDIT AND REVIEW.....	41
7.0	TRAINING REQUIREMENTS .....	43
8.0	REPORTING .....	44
8.1	Reporting of the monitoring activities.....	44
8.2	Reporting of the auditing activities .....	45

## TABLES

Table 1: Roles and Responsibilities.....	18
Table 2: Mitigation measures/actions for construction phase.....	26
Table 3: Details of the Undersigned.....	46
Table 4: Disciplinary Actions Register .....	57
Figure 1: Schematic diagram of a solar photovoltaic power plant operation .....	7
Figure 2: Project Region. Source: NBT, 2023.....	8
Figure 3: Project area and surroundings. Source: NBT, 2023.....	9

## FIGURES

Figure 1: Schematic diagram of a solar photovoltaic power plant operation .....	7
Figure 2: Project Region. Source: NBT, 2023.....	8
Figure 3: Project area and surroundings. Source: NBT, 2023.....	9

## **APPENDICES**

Appendix A – Recruitment Process

Appendix B – Workers Code of Conduct

Appendix C – Disciplinary Actions Register

## Acronyms and Abbreviations

CHSS	Community Health, Safety and Security
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EGM	External Grievance Mechanism
EHS	Environmental, Health and Safety
EPC	Engineering, Procurement and Construction
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
FTE	Full Time Employment
GIIP	Good International Industry Practice
HR	Human Resources
HSES	Health, Safety, Environment and Social
ID	Identification code
IFC	International Finance Corporation
IFC PS	IFC Performance Standards
IGM	Internal Grievance Mechanism
ILO	International Labour Organization
KPI	Key Performance Indicator
LC	Least Concern
LMP	Labour Management Plan
LSA	Local Study Area
MP	Management Plan
MW	Megawatt
NBT	Nazar Business and Technology
NEGU	National Electric Grid of Uzbekistan
Obs.	Observed
OHS	Occupational , Health and Safety
OTL	Overhead Transmission Line
PPA	Power Purchase Agreement
PPE	Protective Personal Equipment
PPP	Public-Private Partnership
PR	EBRD Performance Requirements
Project	Khorezm Solar Project
PV	Photovoltaic
RoU	Republic of Uzbekistan
SPPP	Solar Photovoltaic Power Plant
SS	Switching Station
TMP	Traffic Management Plan
WAMP	Workers' Accommodation Management Plan
WBG	World Bank Group

## 1.0. INTRODUCTION

This document is the Labour Management Plan (LMP), hereinafter the “Plan,” for the Khorezm Solar Photovoltaic (PV) Project (hereinafter the “Project”) that includes the framework and strategy for managing the Project’s Environmental and Social (E&S) impacts and risks associated with the labour aspects. This Plan, therefore, sets out the principles according to which the management and monitoring activities will be implemented during the Project’s construction phase. This LMP has been developed in accordance with the Uzbek regulatory framework, International Finance Corporation (IFC) Performance Standards (PSs), the European Bank of Reconstruction and Development’s (EBRD) Performance Requirements (PRs) and the World Bank Group’s (WBG) General Environmental, Health and Safety (EHS) Guidelines, and the International Labour Organization’s (ILO).

### 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 Votalia 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

This Plan shall be read in conjunction with the following MPs:

- Chance Find Procedure (CFP);
- Community Health, Safety and Security Management Plan (CHSSMP);
- Internal Grievance Mechanism (IGM) procedure;
- External Grievance Mechanism (EGM) procedure;
- Health, Safety, Environment and Social Management Plan (HSESMP).
- Internal Grievance Mechanism (IGM) procedure;
- Occupational, Health and Safety (OHS) Management Plan (OHSMP);
- Supply Chain Management Plan (SCMP);
- Traffic Management Plan (TMP); and,
- Workers' Accommodation Management Plan (WAMP).

## 1.3. Project Overview

The Project comprises the following:

- 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.

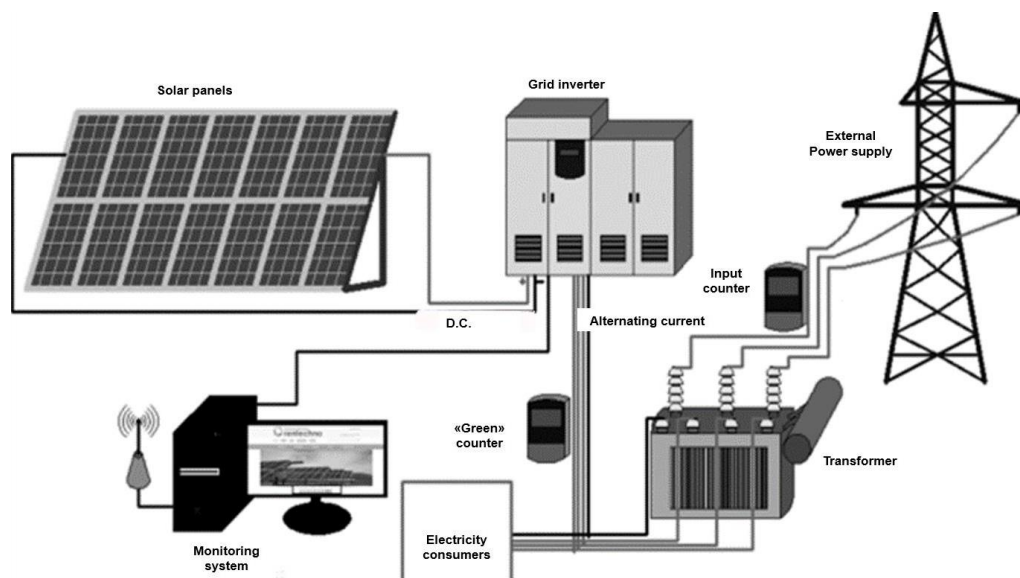
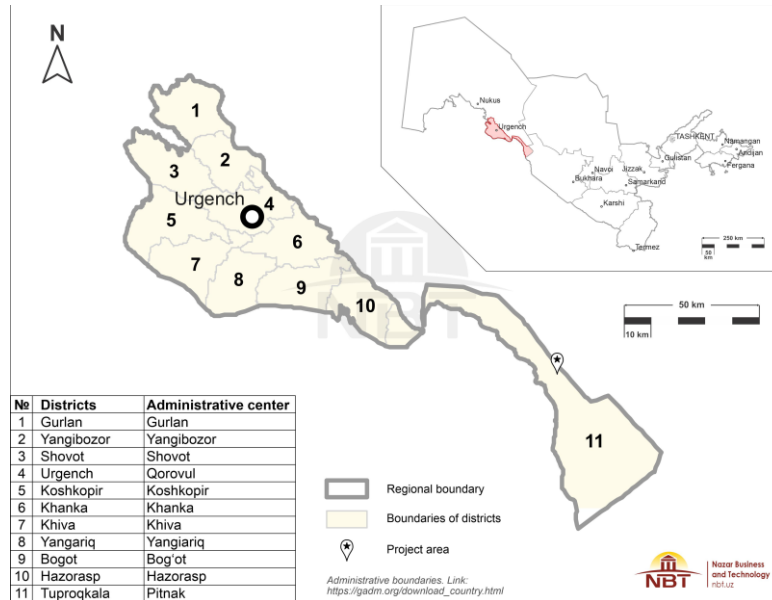


Figure 1: Schematic diagram of a solar photovoltaic power plant operation

The Project will be carried out in the Tuproqkala 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.

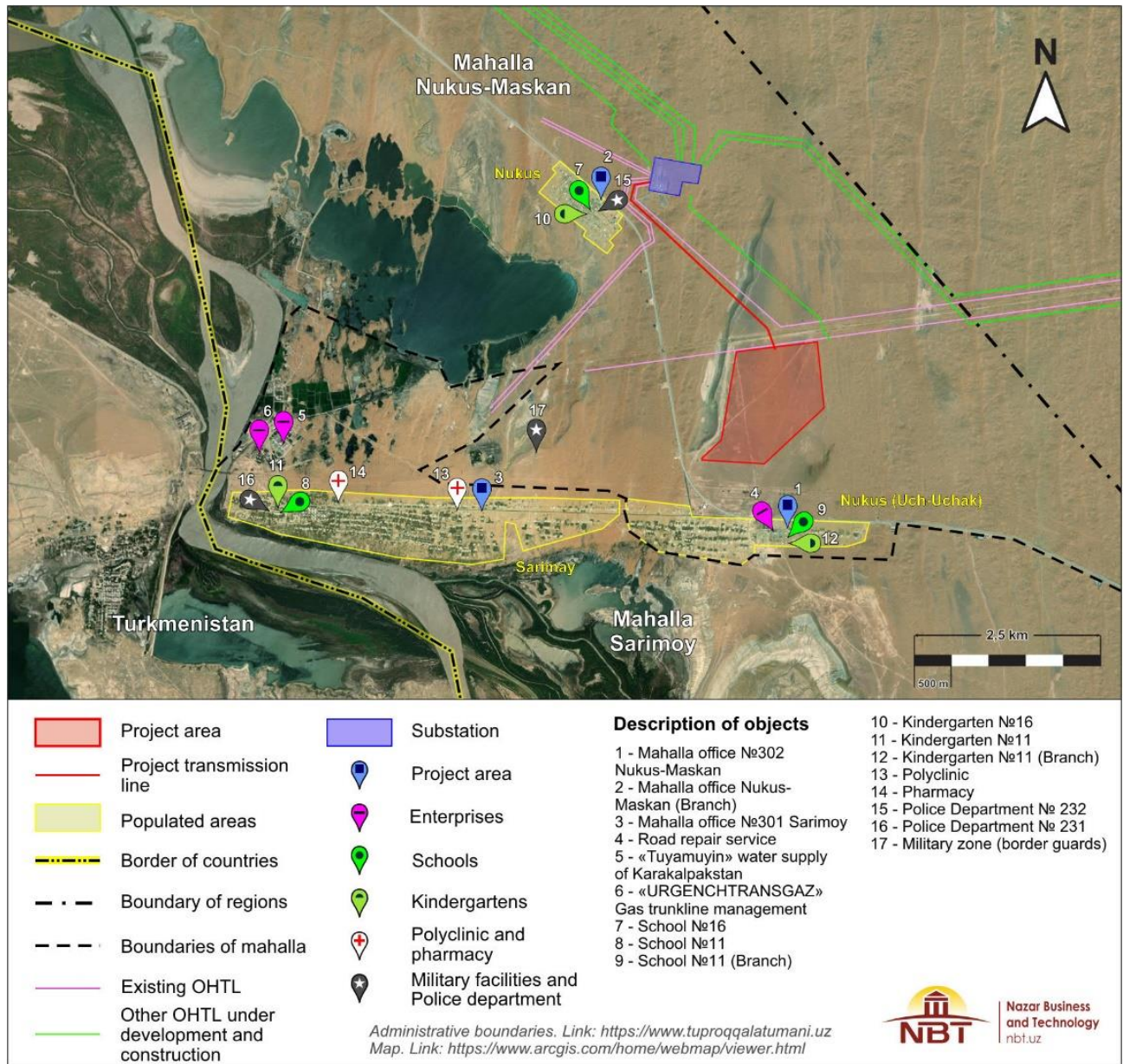


**Figure 2: Project Region. Source: NBT, 2023.**

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 one (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; and
- 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 Overhead Transmission Line (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 Labour Needs and Effects

Based on the “Social Components Impact assessment” (ESIA Section 08C), the Project will generate employment opportunities as a result of increased demand for workforce at the Project site. The estimated total workforce required during the peak construction period is estimated to be between 200-250 workers, which will involve technician and low-skilled personnel. Information on distribution by skills and employment of workers is still currently missing due to the early stage of the Project. Any necessary integration will be carried out at a later stage of the Project, if required.

The Project, to the extent possible, will prioritise the hiring of local workers from the local communities (i.e., communities within the municipalities where the Project is located) since multiple low-skilled tasks such as cable laying, security, cleaning, etc. would allow employment of local workforce. Some high-skilled tasks could be performed by local residents as well, considering that some local residents have workers on other electrical development projects (construction of transmission lines and extension of the Sarimay Sub-Station) in the area before. Contractors and subcontractors will be contractually required to maximise the use of local workforce in the Project. Local workforce will be sourced from the Social Aol as well as from the surrounding areas to the extent the skills and qualifications needed are available, and otherwise in other regions of Uzbekistan.

Project works are planned to be conducted in one shift per day consisting of eight hours, which could be developed during daytime or nighttime in the hot period during summer. In case of necessity, additional overtime could be planned to technical requirements during the construction stage. In compliance with local law, the additional overtime could be a maximum of four hours and it will be remunerated at 1.5 times the normal rate.

The construction activities of the solar plant, the OTL, and the extension of the Sarimay substation will generate both a direct and an indirect demand of workforce. Direct workforce includes workers that are directly hired by Voltaia and by contractors. These workers will be both of skilled and semiskilled type. Workers will be required to carry out the construction activities planned. In addition, a number of workers will be necessary for associated activities, such as the catering, cleaning and security services. Considering the nature of the Project, it is expected that a limited number of skilled workers will be necessary, and most workers will be semi-skilled. The Project aims at employing workers from the local context to the extent possible, however some workers will also come from the rest of Uzbekistan and from abroad. During the consultations performed, some stakeholders indicated the expectation to benefit from employment opportunities. Based on the indications received from the local *Mahalla* chiefs, there are persons in the Aol with the specific skills to meet the requirements of this kind of Project.

On the other hand, indirect workforce demand will be generated along the supply chain for the provision of materials, goods and services. In this case, it is not possible to estimate the number of employment opportunities that will be generated.

Both direct and indirect working opportunities will generate positive effects on the income of the workers and on the overall livelihood conditions of their households, however it should be noted that most of these work opportunities will be of temporary nature and will last only during the construction of the Project. In addition to positive benefits from an economic standpoint, the

Project will also generate an improvement of the skills of workers, which can then be useful to find future employment opportunities.

Voltaia will ensure that labour conditions applied to direct and indirect workers comply with Uzbek's legislations and meet the International Labour Organization's (ILO) core conventions and EBRD PR2, IFC PS2 requirements.

With regards to the accommodation of the workforce, accommodation will be provided via a workers camp to be set up or the adaption of local accommodation solutions that will be customized for the project (such as existing housing complexes). The accommodation will have adequate housing conditions for workers compliant with the Guidance note by IFC and EBRD "Workers" accommodation: processes and standards."

During the first Public Consultation held in June 2023, and the following meetings with the communities performed in November 2023, the following labour risks were identified:

- Local hiring was identified as the utmost importance to the communities, and expectations for the creation of local jobs were expressed; and,
- Potential risk of tension or reputational damage following the outcomes of the previous substation project that resulted in minimal local hires and led to stakeholder frustration.

On the other hand, provisions the Law of the RoU on Employment, 2020 pertaining "Additional Guarantees" that require the following:

- Additional guarantees for women and persons engaged in fulfilling family responsibilities;
- Additional guarantees for the employment of persons under eighteen years of age if required by the local labour authority on the basis of minimum number of jobs available and the number of abled-bodied persons registered with the local labour authority as a job seekers, if any; since *"the employer is obliged to employ persons under the age of eighteen years, directed the local labour authority and other bodies in the employment procedure for jobs at the expense of the minimum number of jobs"* *"Refusal of employment on account of the minimum number of jobs is prohibited and may be challenged in court."*
- Protection from harassment;
- Protection for certain categories of the workforce including:
  - Persons in need of social protection, experiencing difficulties in finding a job and are not able to compete on equal terms in the labour market, including large families and single parents with children under the age of 14 years old and children with disabilities;
  - Young people who graduated from secondary school specialised, professional educational institutions, as well as graduate students studying on state grants;
  - Dismissed from the military service of the Armed Forces of the RoU;
  - Disabled persons and persons close to retirement age;
  - Persons released on penal institutions or have been subjected to coercive measures of a medical character by the court; and,
  - Victims of human trafficking.



To remedy to the abovementioned risks, publication of the Project roles shall be communicated to the local communities present within the Social Aol, including the hiring procedures that prioritise local content. This task shall be properly monitored during the construction phase and throughout the Project lifecycle through Minimisation: Employ Local Workforce (Labour-9) as reported in section 0 below.

## 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;
- International Labour Organization Conventions (ILO Conventions);
- Other Good International Industry Practices (GIIP); and
- All applicable Voltaia's policies, related practices, and procedures.

The Site Management Team and Contractors shall comply with all the legal and regulatory requirements applicable to labour management and lenders' requirements including the following essential elements:

- Voltaia's HR policy regarding:
  - Non-discrimination and equal opportunities.
  - Prohibition of child and forced labour.
  - Gender equality.
  - Prevention of bullying and harassment.
  - Work life balance.
  - Employment of young people under the age of 18.
  - Grievance mechanism for workers.
  - Trade union recognition.
  - Collective bargaining.
  - Health and safety.
- The provision for promoting employment of local workers.
- The minimum employment conditions applicable to project workers, Voltaia and Contractor's employee alike, as per applicable standards including:
  - Contractual arrangements.
  - Minimum wage requirements.
  - Overtime management and payment.

- Paid leave provisions.
- Social security provisions.
- Benefits.
- The provision for preventing negative impacts on local communities associated with the presence of the project workforce.
- The provision for managing workforce accommodations (as detailed in the Workers' Accommodation Management Plan).

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

In terms of labor, 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).

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.

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.

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.

## 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, in particular:
  - IFC Performance Standards and specifically IFC PS1 – Assessment and Management of Environmental and Social Risks and Impacts
  - IFC PS2 – Labor and Working Conditions;
  - IFC Guidance Notes to Performance Standards on Environmental and Social Sustainability, specifically GN53, GN93-97.
- ii) EBRD Performance Requirements (PR) (2019), in particular:
  - EBRD PR 1 – Assessment and Management of Environmental and Social Risks and Impacts;
  - EBRD PR 2 – Labour and Working Conditions.
- iii) World Bank Group Environment, Health and Safety (EHS) Guidelines (General and Industry Sector):
  - General EHS Guidelines (April 2007) which cover four areas of GIIP: Environmental; Occupational health & safety (OHS); Community health & safety (CHS); Construction and decommissioning;
  - EHS Guidelines for Electric Power Transmission and Distribution (April 2007);
- iv) Relevant international conventions and agreements including:



- Forced Labour Convention, 1930 (No. 29);
  - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87);
  - Right to Organise and Collective Bargaining Convention, 1949 (No. 98);
  - Equal Remuneration Convention, 1951 (No. 100);
  - Abolition of Forced Labour Convention, 1957 (No. 105);
  - Discrimination (Employment and Occupation) Convention, 1958 (No. 111);
  - Minimum Age Convention, 1973 (No. 138);
  - Worst Forms of Child Labour Convention, 1999 (No. 182);
  - Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187);
  - Labour Inspection Convention, 1947 (No. 81);
  - Employment Policy Convention, 1964 (No. 122);
  - Tripartite Consultation (International Labour Standards) Convention, 1976 (No. 144)
  - Forty-Hour Week Convention, 1935 (No. 47)
  - Holidays and Pay Convention, 1936 (No. 52)
  - Maternity Protection Convention, 1971 (No. 135)
  - 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
  - Collective Bargaining Convention, 1981 (No. 154)
  - Safety and Health in Construction Convention, 1988 (No. 167)
  - International Labour Organization (ILO) Conventions;
- v) Good International Industry Practice (GIIP).

### 3.0. ROLES AND RESPONSIBILITIES

Voltaia 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 Voltaia's organisational structure or project.

The roles and responsibilities for the implementation of this management plan will be revised according to the any changes in Voltaia'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
<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>
<p><b>Voltaia - Site Manager</b></p>	<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> </ul>

Role	Responsibilities
	<ul style="list-style-type: none"> <li>■ Supervision of this Plan's requirements implementation through regular site monitoring visits and EPC Contractor and Subcontractors documentation/reports review;</li> <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> </ul>

Role	Responsibilities
	<ul style="list-style-type: none"> <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>
<p><b>Site Manager</b></p>	<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 issued by Site HSES Management Team and the Project Owner as per the HSES Management Plan</li> <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 Voltalia HSES Management Plan;</li> <li>■ Provide to Voltalia'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 Voltalia'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 Voltalia's Site Management Team through the monthly report;</li> <li>■ Liaise with Voltalia'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> </ul>

Role	Responsibilities
	<ul style="list-style-type: none"> <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> <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> </ul>

Role	Responsibilities
	<ul style="list-style-type: none"> <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 process to collect their feedback concerning their respective fields of actuation; and</li> <li>■ Review and approve site access HSE documentation.</li> </ul>
<p><b>E&amp;S specialist</b></p>	<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>

Role	Responsibilities
<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> <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 Voltaia 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 Voltaia.</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> </ul>



Role	Responsibilities
	<ul style="list-style-type: none"> <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 Voltalia HSES Plan.

#### 4.0. MITIGATION MEASURES/ACTIONS AND MONITORING ACTIVITIES

The following table (Table 2) details the environmental management and mitigation measures/actions identified for labour-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 labour 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 HR manager will evaluate the situation and, if needed, propose changes and integrations to the

mitigation and monitoring activities included in the present LMP. The proposed changes will be evaluated and approved by Votalia’s Project Manager who will also ensure that actions/measures and monitoring activities are carried out in a timely manner 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
Labour-1	<p><b><u>Minimization: LMP dissemination</u></b> Develop and disseminate the LMP to all staff responsible for managing the construction site and to all sub-contractors working on the Project.</p>	Pre-construction and during all period of construction phase	The LMP has been prepared and disseminated to all Project workers.	100%	EPC Contractor Site Manager Owner HSES Manager EPC Contractor HR Coordinator	<p><b><u>Monitoring activities:</u></b> Conduct periodical internal audits, to ensure that the plan is known at all levels of the organization and implemented; Ensure continuous update of the LMP according to the latest requirements of the national regulations, lenders’ standards relevant to labour contracts, and working conditions. Track LMP adoption and implementation within EPC, Contractors/Subcontractors at all tiers; and, Keep the records of the internal audits.</p>	Monthly throughout the construction phase.	EPC Contractor E&S Supervisor
Labour-2	<p><b><u>Minimisation: Workers’ Code of Conduct</u></b> Prepare and enforce a workers’ code of conduct with indications of the behaviour to be followed</p>	Pre-construction and during all period of construction phase	Employee Induction includes the Code of Conduct.	Full (100%) of the CoC is included in the Employee Induction	EPC Contractor HSES TEAM EPC Contractor HR Coordinator	<p><b><u>Monitoring activities:</u></b> Conduct periodical internal audits, to ensure that the Code of Conduct is known at all levels of</p>	Monthly during the construction phase.	EPC Contractor E&S Supervisor

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
	in interactions with local communities. The code of conduct should be provided to workers during the hiring process and should be covered during the induction training.		Cultural sensitivity is included in the CoC and communicated to all workers in the local language	CoC is translated into Uzbek (100%)		the organization and implemented; and, Keep the records of internal Code of Conduct dissemination audits.		
			CoC included consideration of respectful relations with local communities.	Respect for local communities is included in the CoC (100%)				
			CoC includes the prohibition of any form of gender-based harassment or violence towards female workers or villagers, including girls.	CoC covers GBVH (100%)				
			CoC includes the prohibition of illegal drugs and alcohol	CoC covers illegal drugs and alcohol (100%)				
<b>Labour-3</b>	<b><u>Minimisation: HR Management Procedures and Recruitment Procedures</u></b>	Pre-construction and during all period of construction phase	Project jobs are advertised on all official channels (through Sarimay	All available job postings are advertised	Owner HSES Manager Owner E&S Advisor	<b><u>Monitoring activities:</u></b>  Verify the correct adoption and	Monthly during the construction phase.	EPC Contractor E&S Supervisor

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>■ Put in place transparent and fair <b>recruitment procedures</b>, compliant with the requirements of the local and IFC PS2, that monitor non-discrimination and equal opportunities and that are clearly understandable and accessible to all potential candidates.</li> <li>■ The EPC Contractor has provided the Labor Office with the latest job announcement (upon authorization</li> </ul>		website, job sites and job notice boards as minimum).	ed (100%)	EPC Contractor HR Coordinator	implementation of the HR procedure; -Conduct periodical internal audit to track number and percentage of women and people falling under “Additional Guarantees” in the Labour Law that need to be considered for the Project. -Conduct periodical internal audits, to track the following: -Project roles are correctly advertised and reached all job seekers in the locality, region and country. -Cases of discrimination and unfair recruitment practices -Records of the internal audits. -Cases of candidates with all the required qualification and residing locally (within the Social		
		HR procedures are fully formulated and implemented prior to Project initiation	HR Procedure is drafted and implemented (100%)					
		All grievances or complaints related to discrimination and unfair recruitment practices are properly and fairly resolved.	All grievances / complaints retrieved are properly process and resolved (100%)					

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
	<p>n by Owner following consultation with the Owner ES Manager).</p> <p>This step shall be undertaken once authorized by the Company in writing and shall be undertaken in participation of the Company E&amp;S Manager.</p> <ul style="list-style-type: none"> <li>▪ List of job positions required</li> <li>▪ Description of each job positions</li> <li>▪ Description of required qualifications and experiences for each job position</li> </ul>		<p>Number of candidates with all the required qualification and residing locally (within the Social Aol) that were not offered job interviews.</p>	<p>Zero (0) occurrence</p>		<p>Aol) that were not offered job interviews.</p> <p>-Keep the records of the internal audits.</p> <p>-Provide the Labour Office with continuous updates on all open positions.</p> <p>-Track monthly meetings with the local communities that have been undertaken to announce job positions, including targeted meetings with women representatives (identified during consultations).</p> <p>Keep the records of the internal audits.</p>		
			<p>All collaborators who work within Voltalia Group must have a signed contract as well as collaborators from Subcontractors and Partners.</p>	<p>All Project workers have retrieved a signed contract prior to starting work (100% of all personnel)</p>				
			<p>The EPC Contractor has provided the Labor Office with the latest job</p>	<p>The Labor Office is updated on all availabl</p>				

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>▪ Salary for each position</li> <li>▪ Duration of the assignment for each position</li> <li>▪ Required documents to be submitted to include at a minimum:               <ul style="list-style-type: none"> <li>▪ Curriculum Vitae (CV);</li> <li>▪ Copy of ID to proof area of residence;</li> <li>▪ Formal letter from social security corporation to indicate that the applicant is not currently employed by another</li> </ul> </li> </ul>		<p>announcement (upon authorization by Owner following consultation with the Owner ES Manager).</p> <p>Language aimed at encouraging women to apply for positions or roles will be included e.g., “women are especially encouraged to apply for XX position.”</p>	<p>for all jobs advertised (100%)</p> <p>All job advertised include a disclaimer encouraging women to apply (100% of all jobs).</p> <p>Zero (0) occurrence for jobs advertised without disclaimer encouraging women</p>				

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
	<p>company/project; and,</p> <ul style="list-style-type: none"> <li>No criminal record certificate.</li> </ul>			to apply.				
			<p>EPC Contractor E&amp;S Manager undertook monthly meetings with the local communities to announce job positions required as per requirement above and provide contact details for submission. This will include targeted meetings with women representatives (identified during consultations) in particular.</p>	<p>Scheduled monthly meetings with the local communities to announce job positions have been conducted as planned (100%)</p>				
			<p>Cases of candidates</p>	<p>Locally available</p>				

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
			with all the required qualification and residing locally (within the Social Aol) that were not offered job interviews	candidate (that applied) was not invited to interview (Zero occurrence).				
Labour-4	<p><b><u>Minimisation: Formal Employment</u></b></p> <p>The EPC must ensure that their staff and all the staff employed on the construction site through their subcontractors' supply chain are formally employed and declared, as required by the Uzbek legislation.</p> <p>The EPC contractor must undertake during construction monthly random</p>	Pre-construction and during all period of construction phase	Percentage of workers that have fully understood and are familiarized with all applicable requirements.	100%	EPC Contractor HR Coordinator	<p><b><u>Monitoring activities:</u></b></p> <p>Conduct periodical internal audits, to ensure that the Project's workforce have read and fully understood the policies and procedures;</p>	Monthly during the construction phase.	Owner/ EPC Contractor/ Subcontractors
			EPC Contractor carried out random monthly audits on their subcontractors.	Random monthly audits on formal workers were carried out	100%	<p>Conduct random (monthly) audits on EPC Contractor/Subcontractors' compliance with employment conditions according to local legislations, EBRD/IFC/ESAP/IL O requirements;</p> <ul style="list-style-type: none"> <li>▪ Report findings from audits to Voltaia through monthly E&amp;S reports.</li> <li>▪ Keep the records of the internal audits.</li> </ul>		



Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
	<p>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 ESAP's requirements.</p> <p>All EPC Contractor/Sub contractor workers (within the supply chain) are formally employed and declared, as required by the Uzbek legislation. The EPC contractor must 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,</p>							

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
	EBRD PR2/IFC PS2 and the present ESAP. The results of these audits must be provided in the monthly E&S reports to Votalia.							
Labour-	<p><b><u>Minimisation: Compliance with EBRD/IFC/ESA P's requirements</u></b></p> <ul style="list-style-type: none"> <li>Compliance with national laws and all international standards and convention requirements on labour conditions are maintained throughout the lifecycle of the Project.</li> </ul>	Pre-construction and during all period of construction phase	All Project labour and working conditions are in compliant with all the relevant national laws and regulations and international standards.	100%	Owner HSES Manager Owner E&S Advisor EPC Contractor HR Coordinator	<p><b><u>Monitoring activities:</u></b></p> <p>Conduct periodical internal audits, to ensure that the Project's labor and working conditions, including due diligence assessment and management of labor-related risks are compliant with all the relevant laws and regulations; and</p> <p>Keep records of updated HR Policy</p> <p>Keep the records of the internal audits including random HR audits.</p>	Monthly during the construction phase.	Owner/ EPC Contractor E&S Supervisor
			Conduct due diligence to assess and manage labour-related risks associated with the project.	100%				
			HR Policy is formulated and implemented prior to	100%				

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
			Project initiation					
			Votalia's Code of Conduct (CoC) is included in Votalia's HR policies	100%				
			All Project workers involved in the Project's construction are given a written contract with the HR Policy (available in all Project languages)	100%				
			HR Policy is available and provide to all workers in all applicable Project languages.	100%				
			Random HR audits of Contractor's direct sub-contractors to verify the absence of	100%				

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
			illegal or non-compliant forms of employment are conducted randomly on a monthly basis.					
			The results of audits were properly gathered by Owner and communicated to the Lenders through quarterly E&S reports during construction.	100%				
			Voltalia HSES Policies and HSES Management System Requirements are fully compliant with EBRD/IFC/E SAP's requirements	100%				
			Voltalia HSES Policies are provided in all	100%				

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
			applicable Project languages					
			ESAP Owner is assigned as per EBRD PRs and the Uzbek legislation.	100%				
<b>Labour-</b>	<p><b><u>Minimisation: Workers' Organisation (Trade Union)</u></b> Ensure workers are aware of their rights including:</p> <ul style="list-style-type: none"> <li>- their right to join workers' organisations;</li> <li>-rights related to wages, benefits, working conditions and the temporary nature of the activity by including these topics in the induction training and delivering an informational brochure/ booklet with this information upon hiring.</li> </ul> <p>All HR related communications will be dispatched in written form during the hiring process in the language</p>	Pre-constructi on and during all period of constructi on phase	Percentage workers that have received training and the information booklet with a description of their rights.	100%	Owner HSES Manager Owner E&S Advisor EPC Contractor HR Coordinat or	<b><u>Monitoring activities:</u></b> Conduct periodical internal audits, to ensure that the Project's workforce know their rights and in particular, their rights to form or join workers' organisations.	Monthly during the constructio n phase.	EPC Contracto r E&S Supervis or

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
	of choice of workers.							
Labour-	<b><u>Minimisation: Workers' Grievance Mechanism</u></b> <ul style="list-style-type: none"> <li>Implement a grievance mechanism open to workers. Monitor that all workers, directly and indirectly employed, are informed of it in case they wish to submit grievances. Monitor that the grievance mechanism is managed in line with indications of the procedure and that appropriate budget and resources are assigned to ensure its functioning.</li> </ul>	Pre-constructi on and during all period of constructi on phase	Percentage if workers (EPC Contractor/Su bcontractor) made aware of the IGM in place during the Project's lifecycle.	100%	Owner HSES Manager Owner E&S Advisor EPC Contractor HR Coordinat or	<b><u>Monitoring activities:</u></b> Conduct periodical internal audits, to ensure Project workforce know their rights and in particular, their rights to raise grievance. Conduct periodical internal audits to verify that grievances were retrieved and logged/processed according to the IGM. Carry out internal audit on the correct implementation of the IGM procedure.	Weekly during the constructio n phase.	EPC Contracto r E&S Supervis or
			IGM is fully formulated and implemented by EPC Contractor/Su bcontractor(s)	100%				
			Project has assigned an ESAP owner that will be responsible for running the IGM.	100%				
			All grievances are correctly logged, processed and resolved according to the IGM procedure.	100%				
Labour-	<b><u>Minimisation: Prioritising Local Workforce</u></b> <ul style="list-style-type: none"> <li>Employ local local</li> </ul>	Pre-constructi on and during all period of	Percentage of local workforce Full Time Employee (FTE) hired to	20% 35%	Owner HSES Manager Owner E&S Advisor	<b><u>Monitoring activities:</u></b> - Conduct periodical internal audits, to track percentage of:	Weekly during the constructio n phase.	EPC Contracto r E&S Supervis or

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
	workers to the extent possible. Encourage contractors and subcontractors to employ locally as well to the extent possible through applicable measures such as perform training for local workers, and/or mapping of local competences and skills that could be used during the construction phase.	construction phase	work in senior, supervisory, and skilled positions (against available position)		EPC Contractor HR Coordinator	o Local workforce; Females in the workforce; and Economic contribution resulting from local content.		
Percentage increase of local female workforce across various skill positions over specific period (one year)			2% increase every quarterly	<b>Monitoring activities:</b> Conduct periodical internal audits, to track percentage of: Local workforce; Females in the workforce; and, Economic contribution resulting from local content.		Monthly during the construction phase.		
Percentage of FTE local workforce vs total workforce			8%	<b>Monitoring activities:</b> Conduct periodical internal audits, to ensure that the Project reaches target by end of year; and Keep the records of the internal audits.				
<b>Labour-</b>	<b><u>Minimisation: Compliance with Project's Recruitment Process</u></b> Ensure that workers have received, read and understood fully the	Pre-construction and during all period of construction phase	Frequency of non-compliance committed by Project workers according to the Workers' CoC.	Zero (0) occurrence	Owner HSES Manager EPC Contractor HR Coordinator	<b>Monitoring activities:</b> Conduct periodical internal audits, to track non-compliances with workers CoC:	Monthly during the entire construction phase.	EPC Contractor E&S Supervisor

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
	Worker's Handbook and adhere to the CoC.					Keep records of internal audits for non-compliances.		
Labour-10	<b><u>Minimisation: Resting and overtime policy.</u></b> Ensure that resting and overtime should be described in workers contract	During all period of construction phase	Frequency of non-compliance committed by Project workers according to the Workers' CoC.	100 %	EPC Contractor HR Coordinator	<b><u>Monitoring activities:</u></b> Conduct periodical internal audits, Ensure that all workers aware about their right.	Monthly and weekly	EPC Contractor E&S Supervisor and HR coordinator

## 5.0. RISK MANAGEMENT

To safeguard the well-being of employees, protection of the social and labour aspects related to the workers, the Site Management Team, or Contractor appointed by the Site Management Team, shall be required to adopt a risk management approach. This approach involves identifying potential adverse labour impacts of the Project (if any), conducting risk assessments for work activities, implementing suitable control measures, monitoring, and overseeing the risks, and effectively communicating these risks to all stakeholders involved.

### 5.1.1. Risk Assessment

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

Before the commencement of activities;

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

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

As mentioned in point i) above, 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 documents:

- Risk Assessment Map (refer to Appendix G – Risk Assessment Matrix– H&S of the Votalia's HSES Management Plan);



- Recruitment Procedure, Human Resources Management Procedure are reported in Appendix A: Recruitment Process. The appendix includes guidelines on how the recruitment process, which will be developed and implemented by the EPC Contractor/Subcontractor(s) considering the Project context and compliance with the local regulations and international guidelines and standards.; and,
- Voltalia's Ethics and Code of Conduct, which is reported in Appendix B.
- Direct and Indirect (including Residual) Social Aspects Matrix (refer to **Appendix H – Risk Assessment Matrix – Social Aspects** of the Voltalia's HSES Management Plan).

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

## 6.0. 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 4.1. of the Voltalia HSES Monitoring Plan (Monitoring and Measurement of HSE Performance).

Internal auditing shall address:

- vii) the correct implementation of all applicable standards (Uzbek regulatory framework, IFC PSs, EBRD PRs and WBG General EHS Guidelines);
- viii) the correct implementation of this Management Plan.
- ix) the correct implementation of Contractors' Plan to reflect the requirements of this Plan.
- x) the development and timely implementation of an auditing and review system by Contractors; and
- xi) 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 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 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; this Plan shall therefore be subject to a systematic review process during the construction phase in order to encompass and consider any information relevant to 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.

## 7.0. 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.

### 7.1. Employees Induction Training

All new hires and Project employees must attend all the relevant employee induction trainings that covers their rights and working conditions according to the local and international laws, regulations and standards. HSES related aspects will also be covered in the Induction Training.

### 7.2. Code of Conduct Training

All Project employees must attend a Code of Conduct Training that covers Voltage's Ethics Charter and Code of Conduct (reported in Appendix B).

### 7.3. Disciplinary Procedure

All new hires and Project employees must attend a Code of Conduct Training that covers Voltage's Ethics Charter and Code of Conduct (reported in Appendix B).

#### 7.3.1 Disciplinary Hearing

All new hires and Project employees must attend a Code of Conduct Training that covers Voltage's Ethics Charter and Code of Conduct (reported in Appendix B).

Before any disciplinary action, the Employer should organize a hearing with the Employee concerned by the complaint and:

- Explain the complaint
- Go through the evidence
- Give a chance to the Employee to tell his/her side of the story

Before disciplinary action is taken, the Employer must request a written explanation from the Employee. With prior notice to the Employer, the Employees have the right to bring someone to the disciplinary hearing, who can be either a colleague or a trade union representative. They can present and bring elements to support the case or exchange with the Employee during the hearing. If a significant new facts or information are raised at the hearing, the Employer will consider this and then postpone the hearing for a later date.

#### 7.3.2 Disciplinary Action

All new hires and Project employees must attend a Code of Conduct Training that covers Voltage's Ethics Charter and Code of Conduct (reported in Appendix B).

As per Uzbek Labor Code, there are three types of disciplinary measures:

- Reprimand;

- a fine of not more than thirty percent of the average monthly wage. Internal labor regulations may provide for the imposition of a fine of not more than fifty percent of the average monthly wage.
- Termination of the employment contract.
  - Immediate dismissal will be allowed under the following reasons only:
    - Issues related to GBVH
    - Substance abuse
    - Bribery and corruption

The disciplinary sanctions are formalized by the employer's order and can be applied not later than 1 month from the day of detection of a violence (6 months - after the financial check; 2 years - after audit).

It could also for instance, be dealt with by an agreement between coworkers to mediate personal problems between themselves.

For the avoidance of doubt, no wage deduction can be enforced as a result of a disciplinary action.

## 8.0 REPORTING

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

### 8.1 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):

- xii) Reference to the approved LMP.
- xiii) Scope and Purpose of the monitoring activity;
- xiv) 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, whenever applicable;
- xv) 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);
- xvi) Applicable KPIs according to Table 2.

- xvii) Conclusions on compliance vs. KPI, and eventual observations including the reasons for the deviations, if applicable;
- xviii) 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 LMP; and,
- xix) Quality control procedures applied to ensure consistency and reliability of the analyses or results.

## 8.2 Reporting of the auditing activities

The implementation of this Management Plan must be audited according to the requirements included in Votalia's E&S Management System and section **Error! Reference source not found.** "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:

- xx) List of the items audited (detailed in section 0)
- xxi) Information whether the items have been implemented within the indicated timeline and frequency;
- xxii) Achievement (or not) of the KPIs;
- xxiii) Description of non-compliances eventually identified; and,  
Description of correction measures to be applied

## Signature Page

**Table 3: Details of the Undersigned**

Name (position)	Entity	Date	Signature

## APPENDIX 1 – RECRUITMENT PROCESS

### *Objectives and Values*

It is Votalia's intention to build a strong reputation, recognized globally by the market as one of the best-in-class. Perform according to the best industry standards, acting to exceed the customer's expectations.

#### **Votalia's Vision's statement:**

By the end of 2019, reach 1GW of consolidated installed capacity and reach a total of 3GW of operated capacity in O&M (2GW for third parties and 1GW of own assets).

#### **Votalia's Mission:**

Improve global environment, foster local development.

#### **Votalia's Values:**

- Team Spirit
- Ingenuity
- Integrity
- Entrepreneurship

Votalia strongly believes in serving the communities via corporate citizenship, promoting a sustainable attitude, integration and education.

Votalia seeks to be an employer who applies equal opportunities process.

Any sort of discrimination against the individual dignity will not be allowed, such as discrimination on the basis of ethnicity, age, group gender, national origin, political or religious beliefs, sexual orientation or physical disabilities; hiring, promotion, development opportunities, pay, or benefits are not affected by these.

Any conduct that might configure sexual harassment, mobbing or abuse of power will not be permitted.

Votalia provides for fair treatment of collaborators based on merit.

### *Recruitment Privacy Policy*

Votalia prioritises candidates' privacy and ensures Personal Information is compliant with the national requirements of the RoU as stipulated under the Law of the RoU on *Personal Data* adopted by the Legislative Chamber on April 16, 2019, Approved by the Senate on June 21, 2019.

Voltaia implements its certified Integrated Management System in its operations, which guarantees conformity towards the Quality, Safety and Environment Management Systems ISO standards.

### ***Recruitment Procedures***

Regarding the recruitment process itself, the project team identify needs, define a profile edit a job offer, perform interviews and choose collectively the appropriate candidate without any discrimination and without forced labor and with respect of the local labor law.

The principle of non-discrimination applies to all aspects of employment including recruitment and hiring, but also job assignment, compensation, working conditions and terms of employment.

All collaborators who work within Voltaia Group must have a signed contract as well as collaborators from Subcontractors and Partners.

The EPC Contractor will provide the Labor Office with the following job announcement. This step should be undertaken once authorized by the Company in writing and should be undertaken in participation of the Company E&S Manager.

- List of job positions required
- Description of each job positions
- Description of required qualifications and experiences for each job position
- Salary for each position
- Duration of the assignment for each position
- Required documents to be submitted to include at a minimum:
  - Curriculum Vitae (CV);
  - Copy of ID to proof area of residence;
  - Formal letter from social security corporation to indicate that the applicant is not currently employed by another company/project; and,
  - No criminal record certificate.

Language aimed at encouraging women to apply for positions or roles will be included e.g., “women are especially encouraged to apply for XX position.”

In addition to the above, the EPC Contractor E&S Manager and Owner E&S Advisor will undertake monthly meetings with the local communities to announce job positions required as per requirement above and provide contact details for submission. This will include targeted meetings with women representatives (identified during consultations) in particular.



## **HR Management Procedure**

All workers on site will be provided with a contract which shall include but not limited to the following:

- (i) Name of employer and address of place of work;
- (ii) Workers name, profession, address, and other information for identification;
- (iii) (nature, type of work and job responsibilities; (iv) wage and time of payment; (v) compulsory payments such as medical, life and social insurance and other benefits to include in cash and in kind as agreed;
- (iv) Contract duration;
- (v) Shifts, schedules and overtime (if applicable; and,
- (vi) Other information as may be required. The contract will be signed by the employee and EPC contractor HR manager.

Each employee will be provided with a signed copy of the contract and another copy will be retained with the EPC Contractor HR Manager.

Each employee will be provided with a copy of the contract and Code of Conduct as provided in the Worker Code of Conduct. The signed copy will be retained with the EPC Contractor HR Manager.

Where workers are illiterate, these terms and conditions will be explained orally before signature of contract. If the labour agents are unwilling / unable to do this then this explanation will be provided by the EPC Contractor HR Manager who will also check that workers have a written record of agreed working conditions.

All EPC Contractor employees will be provided with medical, social and life insurance.

## **Wages**

Wages for each employee will be determined on a case-by-case basis by the EPC Contractor HR Manager and other authorized representative from EPC Contractor as appropriate. Wages will be fair (i.e. that meets basic needs to maintain a safe, decent standard of living) and based on qualifications and competencies, professional experiences, allocated roles and job responsibilities, wages at equivalent positions, and other factors as appropriate.

All wages will be paid on time and directly to the worker as set in the contract terms and will be provided either on a weekly or monthly basis.

## **Leaves**

Employees are entitled to the annual leaves stipulated within the “Labor Code of the Republic of Uzbekistan”. The Law requires 21 days of annual leave.

Official holidays and weekly days off will not be counted as part of the annual leaves.

Employees are entitled to sick leaves which are granted through submission of medical proof from a competent medical authority.

Bereavement leaves are not provided in the Labor Code of Uzbekistan. However, employees are entitled to a bereavement leave up to 3 days for the death of immediate family members (parents, spouse, brother, sister, child), and 1 day is granted for next immediate family members (grandparents, uncles, aunts, and father/mother in-law). Bereavement leaves will not be counted as part of annual leaves.

Employees will be required to submit a written notification for annual leaves which must be signed and approved by their direct supervisor and EPC Contractor HR Manager. With regards to sick leaves, employees must submit written notification after they return to work along with medical proof which must then be signed and approved by their direct supervisor and EPC Contractor HR Manager.

### ***Working Hours***

Working hours are set within the “Labor Code of the Republic of Uzbekistan”.

Working hours are set at 8 hours per day or 40 hours per a five-day working week and this does not include rest or break hours. Similarly, working hours are set at 7 hours per day or 42 hours per a six-day working week.

Working hours will include one or more break periods totalling not less than one (1) hour for meals and rest.

The period between the start and the end of working hours shall not be more than 12 hours per day.

In exceptional cases where running the work continuously is required, the relevant administrative department must be notified with providing justifications for overtime operation of work and the period required for completing the work. A written approval must be obtained from relevant administrative department.

In all cases, the maximum duration of overtime work may not exceed four (4) hours for two (2) consecutive days and one hundred and twenty (120) hours per year. An accurate account should be documented for working hours actually worked by each worker, including overtime work.

### ***Employment of Women***

Employment of women will comply with all requirements of the “Labor Code of the Republic of Uzbekistan” in relation to working hours, works in which women cannot be employed, maternity leave rights, and other.

Female workers are entitled to 126 days maternity leave with compensation equal to her comprehensive wage to include the period before delivery and after parturition. In any case female workers will not be required to work 56 days following parturition.

It will be prohibited to discharge or terminate the contract of a female worker during her maternity leave.

Female workers are entitled to 3 hours of nursing leaves per day (each for 30 minutes) during the 24 months following the maternity leave. Such nursing leaves will be considered as working hours and will not be subject to wage deduction.

It will be ensured that female workers are engaged on substantially equivalent terms and conditions to male workers carrying out similar work and in accordance with this procedure specifically related to contract, wages, working hours, leaves, disciplinary actions as identified earlier as well as other conditions discussed throughout the procedure related to Policy on Trade Union Membership and Activities, and Equal Opportunity, Disciplinary policy and processes, Internal Grievance Mechanism (IGM).

### ***Consideration of Persons Requiring Social Protection***

Voltage works to prioritise and accommodate (where possible) persons in need of social protection based on the available positions and consideration of the local content.

### ***Workers' Organization / Trade Union***

Voltage works to prioritise and accommodate (where possible) persons in need of social protection based on the available positions and consideration of the local content.

The Company recognises freedom of association, the right to collective bargaining and the freedom of association of its Employees and committed to promoting social dialogue. All Employees are free to form or join a union in accordance with Legislation.

Company believes that every Employee involved in the Project should feel free and comfortable with raising any concern regarding their work environment (harassment, discrimination, compliance, etc.). For that purpose, Employees can issue alerts either by addressing it directly to their managers, the local HR Manager (or other applicable position) or their labour association/union representatives, or by raising the issues anonymously, if necessary, through the IGM.

The Employer should promote communication between Employees and management, and encourage Employee's organizations and collective bargaining in compliance with Legislation.

### ***Minimum Age of Employment***

The minimum age of employment or work in Uzbekistan is 16 years. It is per international standards and the 138<sup>th</sup> ILO convention held in 2009, which Uzbekistan ratified. However, individuals below 18 years of age require written consent of either parents or parents in loco parentis. In addition, the individuals under the age of 18 are restricted from conducting work activities listed in Article 412 of the Labour Code.

### ***Contract Termination and Retrenchment***

If an employee wishes to terminate his/her contract he must notify the company in writing with an appropriate notification period. In this case a resignation letter must be submitted as well and must

be signed by the employee and the EPC Contractor HR Manager. A copy of the resignation letter will be retained with the HR Manager and will also be maintained onsite in the employee's file.

Retrenchment is not anticipated due to short term nature of the construction works and given that as part of recruitment process the job duration for all workers will be included in contract and will be explained verbally by EPC Contractor HR Manager.

The EPC Contractor will ensure that all workers receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner. All outstanding back pay and social security benefits and pension contributions and benefits will be paid (i) on or before termination of the working relationship to the workers, (ii) where appropriate, for the benefit of the workers, or (iii) payment will be made in accordance with a timeline agreed through a collective agreement. Where payments are made for the benefit of workers, workers will be provided with evidence of such payments.

APPENDIX B

## Workers Code of Conduct

### COMPLIANCE WITH VOLTALIA'S ETHICS AND CODE OF CONDUCT

All employees are required to comply with the internal rules, policies and procedures that derive from the Ethics Charter and this Code of Conduct, including compliance with the control procedure of third parties ("Know Your Third Party"), when applicable, in order to protect the integrity of Votalia, its employees, investors and executives. These procedures are written in English, Portuguese, and French. They are available in the local languages of each of Votalia's offices and on the Intranet so that all employees know it.

The obligation to comply with this Ethics Charter and Code of Conduct also applies to Votalia stakeholders.

All Votalia stakeholders must ensure that they respect national and international laws and regulations applicable in particular those relating to human rights, the fight against corruption and fraud, money laundering and terrorist financing, data protection, international sanctions and export control issues. (Votalia, 2021)

#### *Worker Code of Conduct*

The Project is committed to maintaining good relations with, and ensuring the health and safety of, its workers, neighbours and other communities potentially affected by the Project. All workers will be required to uphold the highest Code of Conduct at all times. This code of conduct is applicable to all employees of the Company and EPC Contractor and all subcontractors involved, including temporary and permanent.

The objective of the Code of Conduct is to avoid or minimize as much as possible, in line with relevant laws, international standards and good industry practices, any risks and negative impact that may be a consequence of the interaction between the Workers and the local population in the Project's Area of Influence.

- All workers are required to sign a copy of the Code of Conduct at orientation acknowledging their commitment to comply with the Code.
- The Code of Conduct will be available in visible spots on the facilities located in the Project Languages. In addition, special provisions will be undertaken for illiterate workers and other language speaking workers.
- Retaliation against any worker who reports or participates in an investigation of a possible violation of this Code of Conduct or other policies of the law is prohibited.
- Any worker's noncompliance of the regulations of the Code of Conduct might be considered as a serious offense, who will be able to apply the corresponding sanctions according to the Labor Law.

#### **A. Bribery and Nepotism**

- No favoritism or nepotism shall be practiced based on kinship, origins, political affiliation, etc.
- Bribery is strictly prohibited to anyone, at any time and for any reason. Special care should be taken into account when giving gifts, paying for meals, entertainment or other business courtesies especially if you are dealing with government officials. Avoid the possibility that such business courtesies could be perceived as a bribe, best to provide courtesies infrequently and to keep their value moderate.

#### **B. Discrimination**

Workers must not practice any discrimination based on personal characteristics. This includes gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disability, age, or sexual orientation

#### **C. Alcohol and Illegal Substances**

- Alcohol consumption during working hours is prohibited.
- No illegal substances may be consumed at any time, and the use of medicines must be authorized by the site doctor or nurses.
- Developer may request random or specific drugs test by way of urine sample at any moment. Refusal to be tested is grounds for dismissal.

#### **D. Natural Resources**

- Hunting wildlife is prohibited.
- Workers are forbidden to collect natural resources (e.g. plants or animals, geological samples etc.) unless specifically authorized to do so as part of Project activities.
- Cutting trees is prohibited unless with proper documented authorization.

Workers shall dispose of waste in a responsible manner and in accordance environmental procedures.

#### **E. Security**

- Workers must carry appropriate identification at all times and there will be no access to site by non-authorized personnel. Workers must be willing to produce identification upon request.

Workers must report immediately any security threat to the project, including people and equipment.

#### **F. Gender Based Violence and Harassment**

The Project is committed to ensuring that equity and diversity principles and practices are applied for workers, local communities, subcontractors and suppliers to support and improve gender equality and social inclusion outcomes across the project activities and interventions.

- For example, Article 19 of the draft Constitution recognizes and guarantees human rights and freedoms following the generally recognized norms of international law and underlines that everyone shall enjoy human rights and liberties from birth. It also prohibits gender discrimination.
- Article 58 of the draft Constitution indicates that women and men shall have equal rights. The State shall ensure equal rights and opportunities for women and men in public and State affairs and other spheres of social and State life.
- Article 42 prohibits refusing to hire women, dismissing them from work, and reducing their wages based on pregnancy or having a child.
- Article 76 of the new Constitution emphasizes that marriage shall be based on the free consent and equality of those entering into marriage.
- Article 78 stipulates that the State shall protect maternity.

### ***Anti-Corruption and Bribery***

This policy sets out the commitments of EPC Contractor in regard to observing and upholding our zero-tolerance position on bribery and corruption.

- Comply with national applicable national and local HR laws and regulations.
- Comply with internationally accepted industry best practice requirements, including those of the relevant International Financing Institutions (IFIs), in specific the IFC Performance Standards, EBRD Performance Requirements, World Bank Group (WBG) General EHS Guidelines and sector specific Guidelines as applicable.
- Conducting business in an ethical and honest manner
- Implementing and enforcing systems that ensure bribery and corruption is prevented.
- Zero-tolerance for bribery and corrupt activities
- Constantly uphold all laws relating to anti-bribery and corruption in all areas of operation
- Preventing bribery and corruption in undertaking business and ensure responsibilities are taken seriously.
- Ensuring that all workers and employees involved in the Project act professionally, fairly, and with integrity in all business dealings and relationships.

All employees are responsible for adhering to and implementing this policy statement. Our business leaders and managers are accountable for monitoring and managing compliance and performance to this policy.

## Alcohol and Drug Use

- A workplace free from alcohol and other drug abuse and its effects will be maintained at all times.
- Substance or alcohol abuse will not be tolerated or condoned.
- Any worker who engages in the sale, use, possession or transfer of illegal drugs or controlled substances, or who offer to buy or sell such substances; the use of alcohol during working hours; or the abuse of prescribed drugs will be subject to disciplinary action up to and including termination.
- Resources necessary to achieve and maintain a drug-free and alcohol-free environment will be committed and provided.
- Although there is no intention of intruding into the private lives of its workers, however it is recognized that involvement with alcohol or other drugs off the job eventually takes it toll on job performance. It will be ensured that workers report to work in a condition to perform their duties safely and efficiently in the interest of their fellow workers as well as themselves.
- This policy applies to all workers while on the job and to situations where a worker's off-the-job or off-premises conduct impairs work performance or undermines public confidence in or harms the reputation of the EPC Contractor.
- All workers that are on drugs for any medical reason must inform their supervisor or manager prior to commencement of any job duties at the project site.
  
- There may be circumstances where workers will be asked to provide an alcoholic or illegal drug substance test sample. This may be as part of an initiative to carry out random testing or otherwise. Any refusal to provide a test sample may lead to disciplinary action.
  
- EPC Contractor encourages any worker who feels might have a drug or alcohol problem to come forward to discuss this confidentially and EPC Contractor is committed to providing professional assistance and support in this case.

## Ethics

All workers are expected to adhere to the basic code of ethics which includes:

- All workers will act in accordance with the key codes of ethics which include the following:
  - Respect for others. Treat people as you want to be treated.
  - Integrity and honesty. Tell the truth and avoid any wrongdoing to the best of your ability.
  - Justice. Make sure you're objective and fair and don't disadvantage others.
  - Lawfulness. Know and follow the law – always.
  - Competence and accountability. Work hard and be responsible for your work.
  - Teamwork. Collaborate and ask for help.
  
- EPC Contractor will ensure that the ethical code is delivered to all workers and that concerns regarding the code can be addressed.
  
- EPC Contractor will promote a trustworthy and honest atmosphere to reinforce the vision of ethics within the company.
  
- Workers will avoid the intent and appearance of unethical or compromising practice in relationships, actions and communications.

- Unauthorized use of trade secrets and marketing, operational, personnel, financial, and technical information integral to the success will not be tolerated.
- Impropriety will not be permitted at any time.
- Workers will not use assets or business relationships for personal use or gain.
- All workers must disclose any conflict of interests regarding their position.
- Every worker needs to apply effort and intelligence in maintaining ethics value.



## Disciplinary Actions Register

### REG 1: DISCIPLINARY ACTIONS REGISTER

All employees are required to comply with the internal rules, policies and procedures that derive from the Ethics Charter and this Code of Conduct, including compliance with the control procedure of third parties ("Know Your Third Party"), when applicable, in order to protect the integrity of Votalia, its employees, investors and executives. These procedures are written in English, Portuguese, and French. They are available in the local languages of each of Votalia's offices and on the Intranet so that all employees know it.

The obligation to comply with this Ethics Charter and Code of Conduct also applies to Votalia stakeholders.

All Votalia stakeholders must ensure that they respect national and international laws and regulations applicable in particular those relating to human rights, the fight against corruption and fraud, money laundering and terrorist financing, data protection, international sanctions and export control issues. (Votalia, 2021)

#### Ref- 3.2 REG 1: Disciplinary Actions Register

**Table 4: Disciplinary Actions Register**

Name	Number / ID	Department	Disciplinary Action # 1	Formal Letter Provided (Y/N)	Reason / Reference	Disciplinary Action # 2	Formal Letter Provided (Y/N)	Reason / Reference