SARIMAY SOLAR PV

KHOREZM SARIMAY PROJECT

SARIMAY-UZBEKISTAN

Occupational health and safety management plan

HSE-PLN-002-01-UZ-S-KHE01-EN

RESPONSIBILITIES

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Acronyms and Abbreviations

EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health and Safety
EPC	Engineering, Procurement and Construction
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
GIIP	Good International Industry Practice
H&S	Health and Safety
ID	Identification code
IFC	International Finance Corporation
KPI	Key Performance Indicator
LC	Least Concern
LSA	Local Study Area
MP	Management Plan
MW	Megawatt
NEGU	National Electric Grid of Uzbekistan
Obs.	Observed
OTL	Overhead Transmission Line
PPA	Power Purchase Agreement
PPE	Protective Personal Equipment
PPP	Public-Private Partnership
PR	EBRD Performance Requirements
Project	Khorezm Solar Project
PS	IFC Performance Standards
PV	Photovoltaic
Ruz	Republic of Uzbekistan
SPPP	Solar Photovoltaic Power Plant
TMP	Traffic Management Plan
WBG	World Bank Group

1.0 INTRODUCTION

This document is the Occupational Health and Safety Management Plan (OHS MP) for the Khorezm Solar PV Project (the Project) that identifies and presents the framework and the strategy for managing Project's E&S impacts and risks associated to the OHS aspects. This Plan sets out the principles according to which the OHS management will be performed for the Project and presents a plan of activities to be carried out throughout the Project's construction phase. This Plan has been developed in accordance with the applicable Uzbek regulatory framework, International Finance Corporation (IFC) Performance Standards (PSs), EBRD Performance Requirements (PRs), Good International Industry Practices (GIIP) and World Bank Group (WBG) General Environmental, Health and Safety (EHS) Guidelines.

1.1 Purpose and Scope

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

This document also provides guidelines to the Engineering Procurement and Construction (EPC) Contractor and Subcontractors to address occupational, health and safety aspects according to the abovementioned national and international standards.

The scope of this Plan includes:

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

This Plan applies to normal operating conditions during the construction activities 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).

1.2 Project Overview

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

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

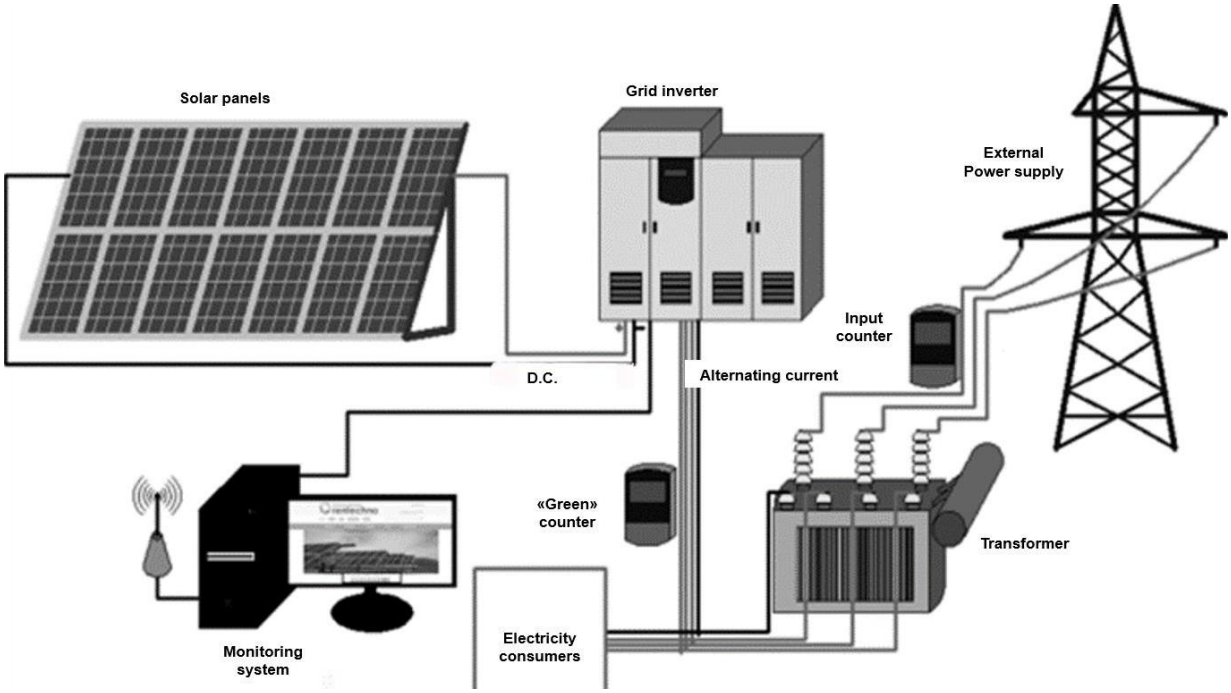
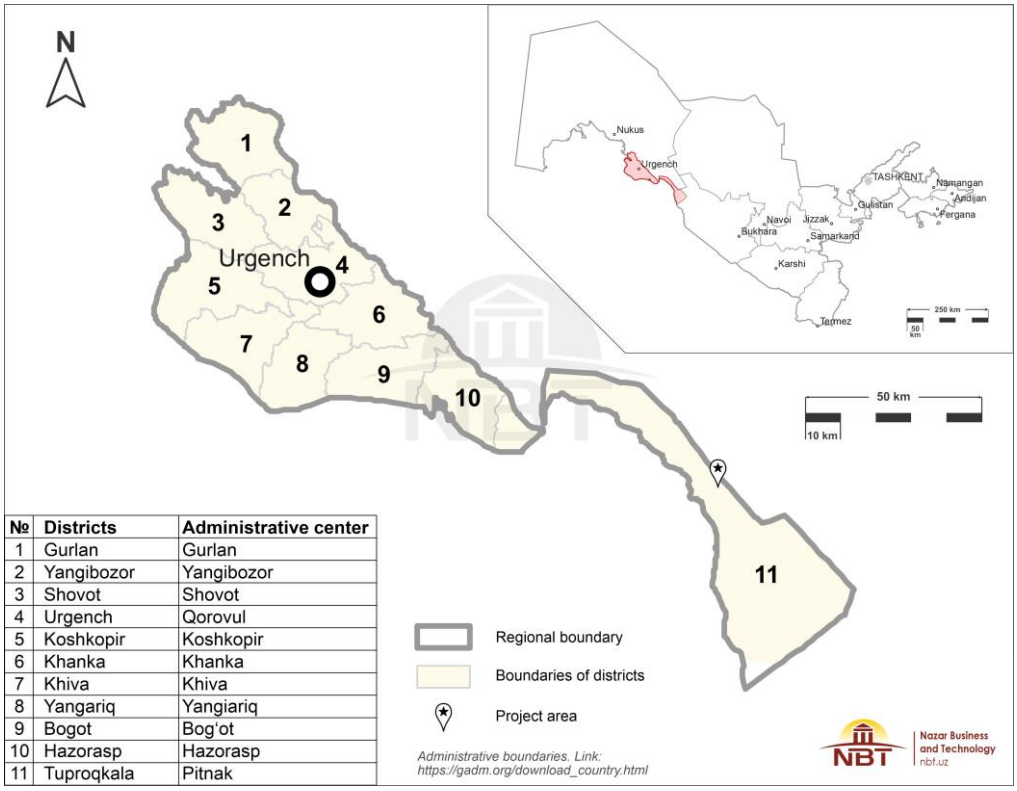


Figure 1: Schematic diagram of a solar photovoltaic power plant operation

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



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

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

The Project is being implemented as part of a Public-Private Partnership (PPP) between the Government of the Republic of Uzbekistan represented by the Ministry of Energy (the Project Proponent), and FE LLC Sarimay

Solar, an entity created in Uzbekistan by Voltalia S.A. (the Project Developer) for the purpose of this Project. The selection process for the EPC Contractor is currently ongoing (as per the release date of this document).

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

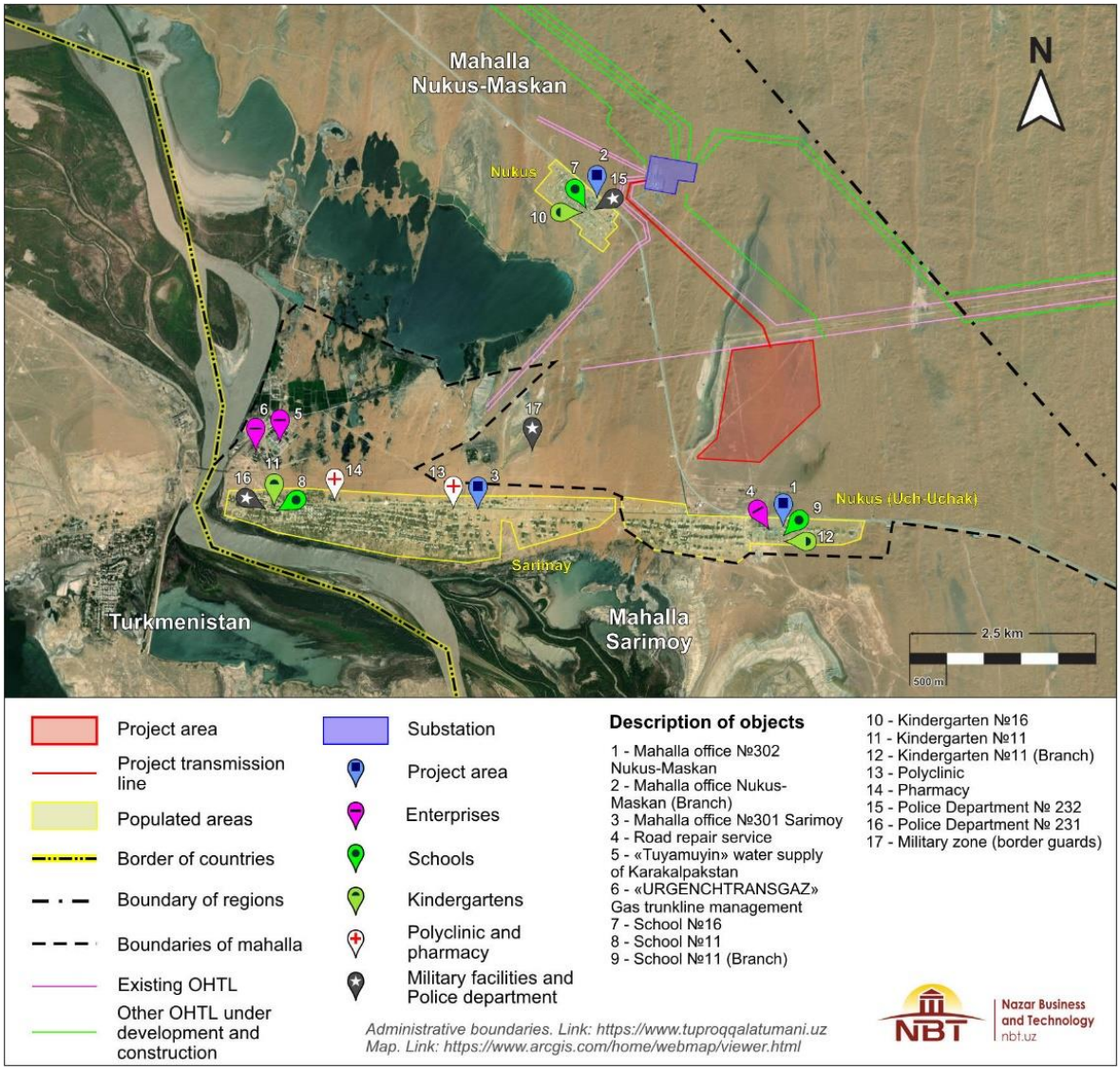


Figure 3: Project area and surroundings. Source: NBT, 2023.

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

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

- Site works preparation and accommodation;
- Unloading/loading equipment;

- Mobilization of vehicles, workers and equipment, materials transportation;
- Vegetation clearing and land stripping;
- Earthworks (excavations, landfill, surface levelling/grading);
- Adaptation of existing roads and implementation of temporary construction roads;
- Installation of lifting cranes and warehouses for storage of delivered power equipment and building materials;
- Excavation of trenches for the laying of cables;
- Concrete pouring under the foundation of buildings and structures;
- Performance tests;
- Building of sewage septic tank and firefighting water tank;
- Site clean-up and demobilization activities;

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

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

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

1.2.1 Project OHS Needs and Effects

Based on the “Social Components Impact assessment” (ESIA Section 08C), the Project will generate the following impacts:

Emission of dust and particulate matter

Increase in emission of dust and particulate matter. Dust is unlikely to cause long-term or widespread changes to local air quality. However, any process that generates dust will also generate fine particulate matter (PM_{10} or $PM_{2.5}$), which can be inhaled and can result in significant health effects. Toxicity of particulate matter depends greatly on their size, less than 10 or 2.5 microns considered especially dangerous.

The closest human receptors are located more than 200 m from the OTL and more than 600 m from the solar plant site. However specific wind conditions can transport part of the dust generated by construction activities to the villages of Sarimay and Nukus maskani. It is well established that dust and particulate can lead to episodic and chronic health problems in human receptors. However, it should be noted that construction activities, particularly those that entail a significant production of dust, will be performed for a limited period of time and that specific mitigation measures will be implemented, which are reported in section 4.0 of this Plan.

Emission of gaseous pollutants

Emission of pollutants, which will be produced particularly by the engine of the vehicles and machinery used for construction activities and by the vehicles used for the transport of goods, materials and workers. In particular,

engines (vehicles and machines) can emit concentrations of greenhouse gases and other pollutants such as sulphur dioxide (SO_2), ozone (O_3) nitrogen oxides (NO and NO_2), carbon oxides (CO and CO_2), and PAHs into the atmosphere.

The impacts are similar to those related to the generation of dust and particulate matter and will affect particularly the surrounding communities. It is well established that pollutants can lead to episodic and chronic health problems in human receptors. As mentioned, the closest human receptors are located at a certain distance from the construction sites. In addition, it should be noted that construction activities will be performed for a limited period of time and that specific mitigation measures will be implemented, which are reported in section 4.0 of this Plan.

Emission of noise and vibration

Heavy vehicles and machinery will generate noise and vibrations, when used for the transport of goods, materials and workers. Some specific activities will be particularly noisy, like earthworks. As mentioned, the Project is performed at a certain distance from receptors and noise decreases in function of the distance. In addition, the A380 road, which is located between the settlements and the Project area, is an existing source of noise in the local context and is likely to generate more noise than the construction activities.

The emission of noise and vibrations can have direct effects on the health of people, especially affecting sleep and concentration. It is foreseen that some construction activities will be performed at nighttime, which is period when noise emissions should be avoided; nighttime activities will be carefully planned to avoid them to the extent possible and to avoid performing noisy activities during that period.

Construction activities, particularly the noisiest ones, will be planned ahead and will be performed for a limited period of time and that specific mitigation measures will be implemented, which are reported in section 4.0 of this Plan.

Increase of road traffic

Increase of heavy and light vehicles movements due to the need to transport goods, materials and staff to the Site. The increased traffic movements can lead to potential accidents involving persons or vehicles, including fatal incidents.

Night-time work and light emission

During construction, artificial illumination will be required at the site entrance and at the accommodation camp. In addition, there will also be illumination at the boundary of the Project site along the fencing. It is expected that some construction activities will occur at nighttime, and in such cases the areas where they are conducted will have to be illuminated.

1.2.2 OHS Minimum Requirements

The subsequent subsections provide the minimum requirements for different OHS aspects to be adopted by Voltalia, Contractors and Subcontractors throughout the entire pre-construction and construction phase. .

1.2.2.1 Manual Handling

The Site Management Team and Contractors shall ensure that manual handling techniques are implemented and all individuals on the project shall be properly trained. As a minimum, the following requirements shall be complied with:

- Planning work site layout to minimize the need for manual transfer of heavy loads.

- Mechanical lifting and moving equipment (i.e., forklifts cranes) shall be provided to avoid repetitive lifting of heavy objects and injuries from over-exertion.
- Requiring multi-person lifts if weights exceed thresholds.
- Selecting and designing tools that reduce force requirements and holding times and improve postures.
- Incorporating rest and stretch breaks into work processes and conducting job rotation.

1.2.2.2 Plant And Equipment

1.2.2.2.1 Plant

The use of heavy mobile plants can pose a risk to the health and safety of site personnel. The Site Management Team and Contractors shall comply with the following, as a minimum:

- No person shall operate any plant unless he/she is trained by licensed trainers and possesses a valid driving license, safety training certificates and safety cards for specified categories of plant. Operators of these plants shall be undergone fit for work medical checks and provided with and use adequate PPE.
- Any plant shall be inspected prior to operations on the worksite and at regular intervals thereafter. Each shall have its valid inspection certificate, inspection tag, specifications, and profile. These documents will be checked prior to being brought to the worksite. Besides, all plants operated on the worksite shall be equipped with adequate safety measures (e.g., machine guards, audible alarms, signals, seatbelts, mirrors, brakes). Any plant that is not qualified shall be refused permission to operate on the worksite.
- Selection of suitable plant for the task and site conditions, such as:
  - Choice of wheeled or tracked plant.
  - Reach and capacity, which can affect the positioning of plant, and the loads that it imposes.
  - Maximum safe operating slope angle.
  - The extent of tail swing on excavators, which can be a hazard if working in restricted areas.
- Ensuring that plant is used properly:
  - Operators shall walk round the plant before setting off, to check for any hazards that could not be seen from the driving position.
  - Plant shall not be overloaded, as this affects stability and / or visibility.
  - Operating procedures shall be followed, and speed limits respected.
  - Aids to vision, such as mirrors to minimize blind spots, shall be properly maintained, adjusted, and used, to minimize risk to people and vulnerable structures in the vicinity of the plant.
  - People working alongside plants shall also be aware of blind spots and be trained in even apparently simple activities such as gaining the attention of the driver, and knowing when it is safe to approach.
  - The plant shall be switched off after use and its key shall always be kept by operators to avoid unauthorized operations.
- Ensuring that plant is in good condition by carrying out and recording regular safety checks (daily / periodic). These include both basic checks by the operator, and periodic specialized tests.
- Adjustments, such as changing buckets on an excavator, shall be carried out in a safe location, by a competent person, in accordance with the manufacturer's instructions.

- Ensuring that the plant has adequate fixed guards to prevent access to hazardous parts.
- Ensuring that plant is only used where the ground has sufficient bearing capacity, particularly when working beyond made roads, or next to excavations or edges of roads.
- Ensuring that plant has functional reversing warning signals.
- Ensure that plant drivers and other users proceed with sufficient awareness of vehicles and people who may be present.

1.2.2.2.2 Equipment

The Site Management Team and Contractors shall comply with the following provisions for equipment used on the worksite, as a minimum:

- Regular verification of all handheld power tools and electrical equipment to ensure they are in a safe working order. Those that comply at the time of inspection shall be tagged and recorded in an inspection register.
- Always keep tools in good condition:
  - keeping them clean and dry.
  - store them properly after each use.
  - keeping cutting tools sharp and covering sharp edges with a suitable covering to protect the tool and to prevent injuries from unintended contact.
- Repairing or installing any electrical equipment must only be carried out by a qualified electrician.
- Ensure that employees are properly trained in the safe use of handheld power tools and electrical equipment.
- Before using power tools, workers must ensure:
  - Electrical connections are secure.
  - Electricity supply is through a residual current device.
  - Safety guards are in position.
  - The machine is switched off before activating the electricity supply.
  - Appropriate PPE is used as required by manufacturer's guidelines or as per outcomes of the risk assessment.
  - Any issues with power tools are reported to their supervisors. Unsafe tools will be tagged and removed from service.

1.2.2.3 Hazardous Substances

Chemical hazards represent potential for illness or injury due to single acute exposure or chronic repetitive exposure to toxic, corrosive, sensitizing or oxidative substances. They also represent a risk of uncontrolled reaction, including the risk of fire and explosion, if incompatible chemicals are inadvertently mixed. The Site Management Team and Contractors shall ensure:

- Maintenance of an updated register of hazardous materials present onsite compiled from the Safety Data Sheet (SDS).
- Appointment of a competent person to receive such materials and ensure their safe storage and use.

- Establishment of procedures for labelling, issue, distribution, and use.
- Communication of the hazards by the competent person to the users.
- Designation of storage areas secured against unauthorized access, and procedures for transport and disposal in line with the Projects' Waste Management requirements.
- Only purchase and store no more hazardous substances than needed.
- Every container of hazardous substances shall be labelled in accordance with Law on Chemical and internationally recognized requirements and standards. Any means of written communication shall be made available in relevant languages so that they can be understood by the workforce and be readily available to exposed workers and first-aid personnel.
- Hazardous substances are returned to the designated storage areas when not in use.
- Adequate warning notices in relevant languages so that they can be understood by the workforce specifying the nature of the danger of the hazardous substances shall be posted and maintained at every place where the hazardous substances are kept or stored.
- Smoking, open lights and flame or spark producing devices shall be prohibited in or around the flammable storage enclosure in the worksite.
- Corrosive, oxidizing and reactive chemicals shall be segregated from flammable materials and from other chemicals of incompatible class (acids vs. bases, oxidizers vs. reducers, water sensitive vs. water based, etc.), stored in ventilated areas and in containers with appropriate secondary containment to minimize intermixing during spills.
- All workers involved in chemical activities (i.e., handling, use, storage and management) are trained in the use of the available information (such as SDS), safe work practices, appropriate use of PPE, and chemical spill response.
- Provision of secondary containment, drip trays or other overflow and drip containment measures, for hazardous materials containers at connection points or other possible overflow points.
- Spill kits shall be made available in areas where hazardous material and liquid hazardous wastes are stored.
- Refuelling on the worksite shall be minimized as much as possible. Where it cannot be avoided, there shall be dedicated refuelling areas or other fluid transfer areas, with impervious surfaces.
- Suitable personal protection equipment (PPE) (footwear, masks, protective clothing, and goggles in appropriate areas), emergency eyewash supplies shall be available in the workplace first aid kit(s).

1.2.2.4 Occupational Noise and Vibration

Occupational exposure of workers to noise and vibration levels in the workplace as a direct result from work must be considered and properly addressed by Site Management Team and Contractors. Statutory limits for noise exposure (generally weighted for an 8-hour exposure period) must not be exceeded.

In absence of local regulations, or in presence of less stringent regulations, the following shall be considered as the occupational exposure limits to be applied:

Table 1-1 Noise and Vibration - Occupational Exposure Limits

Noise

Duration of exposure	First Action Level	Second Action Level	Maximum Exposure Level
8 hours - average measurement in dB(A)	80	85	87
Short – peak measurement in dB(C)	135	137	140

Vibration

Duration of exposure	Exposure Action Level	Maximum Exposure Level
Hand-Arm Vibration (8 hours)	2.5 m/s^2	5 m/s^2
Whole-Body Vibration (8 hours)	0.5 m/s^2	1.15 m/s^2

The following control measures hierarchy must be followed:

- Eliminate/Reduction of the noise or vibration.
- Isolation and insulation of the work area from the source.
- Limiting the period of exposure.
- Use of hearing protection PPE.
- If needed, the monitoring of the exposure of employees through a sampling program.

The Site Management Team and Contractors shall also ensure the following provisions for occupational noise control, as a minimum:

- Noise levels must be maintained below the first action level, so far as is reasonably practicable. To do so, the following measures may be implemented:
  - Design and install silencers and soundproof enclosures on equipment generating noise likely to expose personnel to levels higher than the second action level.
  - Making sure the silencers on mobile plants are in good condition.
  - Maintaining equipment regularly to prevent noise from loose bearings and leaky compressed-air hoses and joints.
  - Direct vents and pressure release valves as far away from site personnel or areas likely to have personnel as possible.
  - Schedule particularly noisy activities (e.g., piling) at times where it is likely to expose a smaller number of people.
- Provide “silent havens”, closed rooms well insulated or soundproof where personnel exposed to high noise levels can rest.

- Work areas where noise levels may be higher than the first action level shall be specifically marked. In addition, access to areas where noise levels may be higher than the second action level must be physically restricted.
- All mobile plant and equipment that emits a noise level higher than the second action level in normal operating condition must be specifically marked in a way that is visible by its operator(s), and that requires them to use hearing protection while operating the equipment.
- If noise levels exceed the first action level, exposed employees must be made aware of the risks and associated control measures. Appropriate PPE must be made available to all exposed persons.
- No employee shall be exposed to a noise level greater than 85 dB(A) for a duration of more than 8 hours per day without hearing protection. In addition, no unprotected ear shall be exposed to peak sound pressure level (instantaneous) of more than 140 dB(C).
- The use of hearing protection shall be enforced actively when the equivalent sound level over 8 hours reaches 85 dB(A) or the peak sound levels reach 140 dB(C). Hearing protective devices provided shall be capable of reducing sound levels at the ear to at least 85 dB(A).
- Workers who are or will be exposed to extensive noise levels shall be subject to pre-employment medical examination and periodic hearing checks after employment.
- If it is not possible to eliminate the noise source or reduce the noise, provide workers with ear defenders (muffs or plugs). However, providing hearing protection is not a substitute for noise elimination and control at source.

1.2.2.5 Dust

Where there is dust generation activity, the Site Management Team and Contractors comply with the following minimum requirements:

- Assessments must be carried out on all works that produce significant quantities of dust.
- Wherever possible methods of work will be employed that will minimize the production of dust. This may involve work methods that will not produce dust, the use of local extraction units or the wetting down of work areas to minimize the production of dust.
- Wetting down shall only be carried out where it is safe to do so and shall not be done if there is any risk of contact with live electricity. As an additional measure, any operatives working within dusty areas shall be issued with Personal Protective Equipment determined by the risk assessment for the process.
- Dust extraction units will be attached on all chasing machines or abrasive wheels used for operations that will produce dust.

In addition to requirements described in this section a complementary Air Quality Management Plan may be issued to further specify the project´s necessities (refer to **Annex A – Project HSES Management Sub Plans Index**).

1.2.2.6 Personal Protective Equipment

Personal Protective Equipment (PPE) provides additional protection to workers exposed to workplace hazards in conjunction with other facility controls and safety systems. However, PPE is considered as the last resort after other facility controls have been exhausted.
The Site Management Team and Contractors shall adopt the following approach:

- Active use of PPE if alternative technologies, work plans or procedures cannot eliminate, or sufficiently reduce, a hazard or exposure.
- Identification and provision of appropriate PPE that offers adequate protection to the worker, coworkers, and occasional visitors, without incurring unnecessary inconvenience to the individual. PPE shall be provided to workers at no cost.
- The following standard PPE is mandatory for all personnel and visitors:

Table 1-2 Standard PPE

Personal Protective Equipment	Requirements
Safety helmet	In accordance with EN 397:2012 or equivalent must be worn at all Project sites (except in completed office and control rooms and PV sites under operations). For work at height the helmet shall be fitted with a chinstrap.
Safety footwear	S3 code in accordance with ISO 20345:2011 or equivalent must be worn.
Eye protection	All personnel on Project Sites and operations (except in office and control rooms) shall wear eye protection, and as a minimum: - Safety spectacles offering eye and side protection against impact in accordance with EN 166:2001 or equivalent must be worn at all times. - Corrective glasses must comply with the requirements of safety spectacles (EN 166:2001 equivalent) and must offer side protection against impact or must be otherwise protected with over-spectacles that comply with the requirements of safety spectacles.
High visibility jacket or vest	Class 2 according to ISO 20471:2013, or equivalent: - Must be worn by all pedestrians on Project sites (except in completed office and control rooms), and - Must be worn by all personnel working on the field. - This vest is not allowed to be used during Electrical Works due the fact it is not fire resistant.
Safety gloves	Safety gloves adapted to the task being performed must be worn to protect hands against injury. Working without gloves is only permitted where no risk to the hands exists or where the work cannot be safely performed while wearing gloves
Protective work clothing	Legs, arms, and body shall be covered by protective clothing adapted to the type of work and the work environment: - Long trousers and long sleeves that protect against the risk of abrasion, cuts, contact burns and sun burns shall be used on Project sites (high-visibility vests with long sleeves may be used, as long as they are made of a solid material providing sufficient protection), and - The fabric used for work clothing shall be unblended cotton, so far as is reasonably practicable.

- Other non-standard PPE may be required based on the outcomes of the activity specific risk assessment and the requirements of local legislation and selected according to criteria on performance and testing established (e.g., a suitable size and fit and reasonably comfortable). The quality of selected PPE shall meet relevant, recognized standards.

- PPE shall be checked to fit employees well and not interfere with other safety equipment.
- PPE usage shall be regularly supervised to ensure they are used when they are in need.
- Any person supplying the PPE shall also:
  - Provide workers with information, training, and instruction in the proper use, wearing, storage and maintenance of PPE.
  - Ensure that any other person at the workplace (such as Project Owner, visitors, or inspectors) is appropriately provided with PPE to wear as required.
- Proper maintenance of PPE, including cleaning when dirty and replacement when damaged or worn out. Proper use of PPE shall be part of the recurrent training programs for employees.
- The PPE provided to workers shall be entered into a register, with the signature of each worker receiving the PPE. The register shall be maintained and kept updated.

1.2.2.7 Drugs And Alcohol

Voltalia has the right to refuse work to any worker who is in an unfit state to perform his/her work in a safe manner. To assist in these requirements, all site personnel shall adhere to the following:

- No alcohol is allowed to be consumed before and during working hours.
- No illegal drugs shall be consumed or permitted on property at any time or under any circumstance.
- No person who is under the influence of alcohol or drugs is allowed onsite.
- Workers who are taking prescription medication that may affect their safety at work (that cause drowsiness), are to inform their supervisors of the circumstances so that appropriate duties may be assigned.

1.2.2.8 Housekeeping

Slips, trips, and falls on the same elevation are also among the most frequent causes of lost time accidents at work sites. These hazards are often attributed to poor housekeeping, such as excessive waste debris, loose materials, liquid spills, and uncontrolled use of electrical cords and ropes on the ground.

To eliminate and minimize hazards associated with poor housekeeping, the Site Management Team and Contractors shall comply with the following minimum requirements:

- Ensure that the material or equipment is not stored, stacked, or placed so close to any opening or edge of a floor, scaffold, platform, or structure as to endanger persons below the opening or edge.
- Safe unloading, storage, and laydown of materials.
- Material laydown and storage areas shall be well organized, clearly, and permanently identified and shall not create supplementary hazards to persons.
- Implementing good house-keeping practices, such as sorting <<<and placing loose materials or debris in established areas away from foot paths.
- Debris shall not be allowed to accumulate to constitute a hazard in the worksite.
- Liquid spills shall be cleaned up immediately upon occurrence.
- Locating electrical cords and ropes in common areas and marked corridors.
- Use of slip retardant footwear.

1.2.2.9 Weather Conditions

1.2.2.9.1 Adverse Weather

Adverse weather is another key operational feature that can create risks for workers on the worksite. The Site Management Team and subcontractors shall adopt the following approach:

- High-risk activities (refer to section 7.1 – High Risk Activities) are not allowed to be performed under extreme circumstance of natural conditions that may impact the task increasing the risk of the activity. Those conditions include the following but not limited to:
  - Storms
  - Lightning
  - High Speed Wind
  - Earthquake
  - Inundation
  - Avalanche
- When high winds are forecast, additional checks shall be undertaken to ensure that materials and stored components are secured against being blown away or blown over.
- Regularly monitor meteorological forecasts and schedule the work accordingly, and use lightning detectors, if possible, to provide early warning of approaching thunderstorms.
- PPE shall be suitable for the prevailing weather conditions, ensuring that wearers remain dry and at a comfortable temperature, while still performing its essential protective functions.
- Take actions detailed in the Emergency Preparedness and Response Plan to respond to inclement weather in a timely manner.

1.2.2.9.2 Heat Stress

The Site Management Team and subcontractors shall adopt the following approach:

- Monitor weather forecasts for outdoor work to provide advance warning of extreme weather, and plan and manage working schedule to avoid dehydration and heat stress related illnesses.
- Provide good workplace ventilation for closed spaces.
- Provide in sufficient number resting areas.
- Reduce the duration and / or frequency of tasks to be undertaken in the hot environment and allow for frequent breaks.
- Increase the quantity of fresh and cool (10 to 20°C) water per employee and per day and make it available in the immediate working area, so that any worker could drink 50 cL every 15 minutes while working.
- Include sun protection in training for workers (e.g., induction training, toolbox talks).
- Provide workers adequate clothing to protect themselves from the effects of working while exposed to ultraviolet rays.

1.2.2.9.3 Cold Stress

Workers who are exposed to extreme cold or work in cold environments may be at risk of cold stress as a result of extreme cold weather that can lead to health emergencies in susceptible people, such as those without shelter, outdoor workers, and those who work in an area that is poorly insulated or without heat. (CDC, 2024) Whenever temperatures drop below normal and as wind speed increases, heat can more rapidly leave your body. These weather-related conditions may lead to serious health problems. (CDC, 2024)

The Site Management Team and subcontractors shall adopt the following approach, as per the guidelines provided in the Occupational Safety and Health Administration for Cold Stress[1]:

- Monitor weather forecasts for outdoor work to provide advance warning of extreme weather, and plan and manage working schedule to avoid dehydration during cold weather.
- Provide good workplace that includes radiant heaters to keep workers warm and shield work areas from drafts and wind to reduce wind chills.
- Provide in sufficient number resting areas.
- Reduce the duration and / or frequency of tasks to be undertaken in the cold conditions and allow for frequent breaks.
- Provide warm sweetened liquids for employees to consume while working.
- Provide training for workers (e.g., induction training, toolbox talks) to prevent and recognise cold stress illnesses and injuries and how to apply first aid treatment, including the proper use of PPE and work practices to reduce the risk of cold stress.
- Provide workers adequate and quality clothing (e.g., insulated and waterproof gloves and boots, jackets and additional socks or clothing in case of need to change) to protect themselves from the effects of working while exposed to cold weather. (US Gov, 2024)

1.2.2.9.4 Workplace Lighting

The Site Management Team and Contractors shall ensure:

- Every part of the worksite that is in use shall, to the degree feasible, receive natural light and be supplemented with sufficient artificial illumination, especially interim roads, and work areas where night work is carried out, to promote workers' safety and health, and enable safe equipment operation.
- All workplaces (i.e., excluding access ways and vehicle routes) must be sufficiently light, in such a way that lighting levels are equal to or greater than 50 lux at any point of the workplace. If natural lights do not meet this condition, artificial lights must be in place.
- Areas where people may be present and where there is no or low natural light (i.e., where the lighting levels may be lower than 50 lux) must be provided by appropriate and operational emergency lighting that indicates safe evacuation ways.
- Where artificial lighting is in need, it shall not change the apparent colour or visibility of any safety signs or other safety-related items such as fire extinguishers.

[1] Cold Stress Guide | Occupational Safety and Health Administration (osha.gov)

1.3 Relationship with other Management Plans

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

- Community Health, Safety and Security Management Plan;
- Emergency, Preparedness & Response Plan (EPRP);
- Traffic Management Plan (TMP); and,
- Pollution Prevention Plan (PPP).

1.4 Applicability

This Plan applies to all Voltalia activities related to the Project and also 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.

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;
- ILO Code of practice for safety & health at work, convention no: 194 (List of occupational diseases recommendation), 2002
- C187 Promotional Framework for Occupational Safety and Health Convention, 2006
- R197 Promotional Framework for Occupational Safety and Health Recommendation, 2006
- C155 Occupational Safety and Health Convention, 1981
- R164 Occupational Safety and Health Recommendation, 1981
- P155 Protocol of 2002 to the Occupational Safety and Health Convention, 1981
- EBRD Performance Requirements;
- World Bank Group EHS Guidelines;
- Voltalia's policies, related practices, and procedures.

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

2.1 National Requirements

In terms of labour and Occupational Health and Safety, the Constitution of the Republic of Uzbekistan includes a chapter on the OHS stating the following:

i) Employer must create working conditions that meet the safety and hygiene requirements. (Article 211)

ii) Employee must comply with the norms, rules and regulations pertaining labour protection including complying to safe operation, use of correct PPE and notifying the Supervisor (foreman, master, chief of site and others) of any situation that creates a direct threat to human life and health as well as any accident that occurred in the course of or in connection with it. (Article 212)

iii) The right of worker to information on occupational safety and health. The employer must inform employees about OHS obligations specific to their workplaces and production (Article 213)

iv) Employer is obliged to organise a pre-employment contract with a periodic (during work) medical examinations of the following employees:

   a. Persons that have not attained the age of eighteen;

   b. Men who have reached sixty years of age, women who have reached fifty-five years;

   c. Persons with disabilities;

   d. Employed in jobs with unfavourable working conditions, night work and on work-related traffic;

   e. Engaged in work in the food industry, trade and other sectors, directly serving the public;

   f. List of works with unfavourable working conditions and other work, under which preliminary and periodic medical examinations, and the order in which they are established by the Ministry of Health of the Republic of Uzbekistan.

   g. Workers referred to in the first part of this article, cannot miss their medical examination. When deviation from these workers pass examinations or their failure to meet the recommendations issued by the medical commissions on the results of surveys, the employer may not allow them to work.

   h. Do not use employees are allowed to work, it contraindicated for health reasons.

   i. The employee has the right to request an extraordinary medical examination, if he believes that the deterioration of his health is related to working conditions.

   j. The workers do not bear the cost of a medical examination.

v) Comply with the Uzbekistan's sanitary rules, norms and hygienic standards (SANPIN).

vi) Conduct briefing and training on occupational safety and health of workers. Admission to the work of persons who are not training, instruction and examination of labour protection is prohibited. (Article 215)

vii) Fulfil all the requirements under the Labour Law "Additional Guarantees for Women and Persons Engaged with family responsibilities" and "Additional Guarantees for Youth."

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.

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

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

2.2 International Standards

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

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

   a. IFC PS4 and IFC GN4 – Community Health, Safety, and Security;

   b. Within Guidance Note 4, the following specific GNs are relevant: GN5, GN11.

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

a. EBRD PR 4 on Health and Safety, which establishes management requirements with regards to traffic and road safety risks to workers and potentially affected communities;

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

a. Section 3 – Community Health and Safety 3.4, more specifically sub-section 3.4 – Traffic Safety;

3.0 ROLES AND RESPONSIBILITIES

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

General roles and responsibilities for the implementation of this Plan are provided in Table 3-1. The roles and responsibilities for the implementation of this management plan will be revised according to the any changes in Voltalia's organisational structure.

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

Table 3-1: Roles and Responsibilities.

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

Role	Responsibilities
	■ Liaise with the Lenders on Project E&S performance, to seek alignment between their expectations; ■ Review and approve site access HSE documentation; ■ Overseeing, managing, and allocating adequate resources for the implementation of the HSES Management System.
E&S advisor	■ Oversee this Plan; ■ Ensure that all the environmental authorizations and permits have been obtained in a timely manner; ■ Monitor close out of environmental action items in the Action Tracking System; ■ Review the Environmental management documents; ■ Ensure all corrective/preventive actions related to environmental risks and incidents are implemented; ■ Liaise with Site Managers on relevant Environmental issues and plan environmental performance monitoring meetings; ■ Supervise and manage the work of the Environmental specialists; ■ Review Environmental incident reports; ■ Perform regular site and work front visits and inspections and monitor high environmental risk activities and the commencement of activities in new areas or areas with significant environmental sensitivities; ■ Ensure implementation of the Project's Management Plans in accordance with environmental permit requirements and ESIA requirements if different; ■ Ensure the social components of the Project are compliant with this Plan, permit requirements, local legislation, and Lenders' requirements; ■ Ensure that stakeholder engagement during construction is in line with Lender's requirements and national regulations. ■ Supervise the work of the Community Liaison Officer and ensure the correct implementation of the stakeholder engagement plan and grievance mechanism; ■ Ensure the implementation of the community health and safety management measures; ■ In coordination with HR Coordinator, verify that all social measures from LMP are implemented on site; ■ Report to the Lenders on (i) Implementation status of the ESAP and of the Register of commitments, with success/fail indicators (see ESAP action 1.4) and (ii) the Environmental and social performance of the project activities, and (iii) the management of non-compliances and corrective actions; and Final approval of this Plan and subcontractors plans/procedures prior to their implementation.
Voltalia - Site Manager	■ Day to day supervision of the site;

Role	Responsibilities
	■ Supervision of Project execution timeline and its disclosure to the Site Management Team; ■ Ensure compliance of requirements by Contractor at the different phases of the Project (pre-qualification reports, kick off meetings, periodic performance evaluations...); ■ Supervise dissemination of the updated version of this Plan to all Site workers, including the EPC Contractor and Subcontractors; ■ Supervision of this Plan's requirements implementation through regular site monitoring visits and EPC Contractor and Subcontractors documentation/reports review; ■ Supervision of adoption and implementation of disciplinary actions upon failure to comply with requirements; ■ Supervision that all workers have proper training to implement the requirements of this Plan; ■ Participation and supervision in the worksite Risk Management process (risk assessment, RAMS, PTW, interface management, definition of control measures, and change management); and ■ Ensure contractors and service providers compliance with EBRD 2019 PRs and IFC 2012 PSs by including them in the list of applicable E&S requirements to be complied with. Require them, in a legally binding manner, to cascade the requirement down their subcontractors chain.
HSE Coordinator	■ Implementation of the HSE Policies, Sustainability principles, procedures and best practices, transversely to Voltalia region; ■ Keeping up-to-date with any changes in safety regulations and standards; ■ Monitor and ensure that the Projects' E&S objectives are achieved; ■ Ensure the Projects' E&S requirements and this Plan are communicated to, and implemented by the Projects' personnel, including the Site Management Team and Contractors; ■ Prepare a register of all E&S commitments from the permitted EIA, ESIA and ESAP actions;
EPC Contractor - Site Management Team	
Project Manager	■ Overall delivery of the Project and HSES performance, and assurance of compliance with budget, schedule, project policies, plans and procedures; ■ Ensure that the necessary resources, authority, information, are provided to enable the execution of Project's HSES management activities and HSES procedures; ■ Ensure that HSES management issues are included in periodic reports to be to be sent to Site Management Team, and also in reports prepared by Site Management Team to be sent to the Project Owner; ■ Submit periodic reports to the Project Owner. ■ Cooperate with Project Owner to obtain necessary permits and/or legal documents for the Project, if necessary. Hold a dedicated register of these permits and authorizations, indicating their scope and validity date if any.;

Role	Responsibilities
	■ Supervision of the proper implementation of this Plan by the Site Management Team and subcontractors plans/procedures prior to their implementation through regular meetings and review of reports; ■ Designating specific personnel on site or at the administrative level for the implementation of the E&S Management System; ■ Present monitoring data to Voltalia's Corporate Level and to the Lender; ■ Liaise with the Project Owner, corporate level HSES team, for implementation of this Plan; and ■ Follow-up on any grievances and non-Conformities, non-compliance or deviation from the requirements of this Plan.
Site Manager	■ Ensure that all the activities of the Project are carried out in accordance with this Plan and implement control measures and procedures that have been issued by Site HSES Management Team and the Project Owner as per the HSES Management Plan ■ Ensure that the international E&S requirements applicable to the Project are included - as conditions - in contracts with Subcontractors and suppliers; ■ Instruct and/or train workers on the requirements of this Plan; ■ Ensure that Personal Protective Equipment is always available on site and is used whenever required; ■ Deliver all the documents required for contractors' validation as per the requirements of this Plan and the Voltalia HSES Management Plan; ■ Provide to Voltalia's Health and Safety Site Supervisor, before the start of any hazardous work, the Environmental Risk Assessment and Method Statement – RAMS; ■ Identify the need for specialized Subcontractors to carry out specific tasks on site in compliance with this Plan provisions; ■ Coordinate with Voltalia's HSE Manager, organize and participate in the auditing activities organization, maintain a program of audits and inspections at the Construction Site; ■ Ensure that the raised non-conformities based of this Plan are addressed and resolved as quickly as possible; ■ Ensure the planning, preparation and provision of the trainings in order to enable the full implementation of the Plan; ■ Check the E&S performance of all Subcontractors in relation to this Plan implementation; ■ Verify the compliance with the contractual arrangements and with the Project standards and requirements; ■ Provide the monitoring reports to Voltalia's Site Management Team through the monthly report; ■ Liaise with Voltalia's HSE Manager for proposing and discussing – where necessary – potential changes and integrations of the monitoring activities of this Plan; ■ Report and resolve the non-conformities raised; ■ Notify and report to the Site Manager any Near Misses, hazardous conditions and incidents during construction activities;

Role	Responsibilities
	■ Perform the Contractor Management process (pre-qualification reports, kick off meetings, periodic performance evaluations...); and ■ Ensure that all plant machinery and equipment are suitable for the use allocated to them and maintained in good working order, and record related maintenance activities.
HSES Manager	■ Organizing and delivering the implementation of all the Health, Safety and Environment obligations, also for subcontractors, as per the EPC contract, the ESAP, the Environmental Permit and the Uzbek Environmental, Social, Health and Safety legislation; ■ Be conversant with EBRD PRs, IFC PSs and the Uzbek E&S legislation; ■ Oversee performance and ensure compliance of the Project with requirements of this Plan through regular meetings with the E&S Site Management Team and review of E&S reports; ■ Ensure that sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of actions, measures and monitoring activities; ■ Ensure ESMS is in-line with the Project ESMS; ■ Collecting, organizing and reviewing monitoring data and performance monitoring reports provided by the HSE specialist(s) and providing summary results of such reports to the Project Manager; ■ Bringing Non-Conformities immediately to the attention of the Project Manager and ensuring that action/measures and monitoring activities are carried out timely and adequately according to this Plan requirements; ■ Programming inspections and audit activities to monitor the correct implementation of this Plan and of HSE specialist(s) tasks; ■ Monitor the compliance of the activities by Site Team, and subcontractors, with the time schedule and conducting regular inspections and audits of the traffic management activities to identify any non-conformances; ■ Addressing Non-Conformities through the definition of Preventive/Corrective actions proposing to the Project Manager, if necessary, amendments and/or updates to this Plan and issuing Plan revisions; ■ Search for continuous improvement through audits and monitoring of the HSE KPIs and internal processes; ■ Advise and support the Project Manager and Site Manager on matters related to HSES; ■ Develop HSES training and induction schedules and content and deliver the training and induction material such as site induction and toolbox talks; and ■ Review and approve H&S Management documents delivered by the Health & Safety Site Supervisor.
Health & Safety Site Supervisor	Communicate and instruct workers in proper work practices and update instructions as needed, make records of this instruction; ■ Supervise workers within their area, take corrective action when HSES issues are noted and report these issues to the Site Management Team; ■ Participate in internal audits and investigation of incidents to determine root cause and corrective actions;

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

Role	Responsibilities
	■ Conduct and analyse the workforce surveys as a monitoring tool; ■ Oversee that the recruitment processes are fair and transparent; ■ Ensure that workers are provided with clear and accurate information about their terms of employment, including wages, working hours, and benefits; ■ Oversee the implementation of policies to prevent discrimination in the workplace based on gender, ethnicity, nationality, or other factors, and to prevent and address child labour and forced labour; ■ Ensure that workers are paid fair wages in accordance with applicable laws and industry standards; ■ Monitor and enforce compliance with working hour limits to prevent excessive overtime; ■ Address internal grievances through the Community Grievance Mechanism and ensure corrective action as per the mechanism; ■ Ensure that workers have adequate rest periods and time off; ■ Oversee the communication and implementation of grievance mechanisms; ■ Build the capacity of Subcontractors to ensure effective labour management; ■ Collaborate with relevant stakeholders to promote positive impacts on local communities; ■ Put in place monthly random HR audits of its direct sub-contractors to verify the absence of illegal or non-compliant forms of employment. The results of audits shall be reported to Voltalia through quarterly E&S reports during construction; and ■ Ensure that all the staff employed on the construction site through his subcontractors chain is formally employed and declared, as required by the Uzbek legislation. Undertake during construction monthly random audits throughout his sub-contractors chain to verify compliance of the employment conditions with the provisions of the Uzbek labour legislation, EBRD PR2/IFC PS2 and the present ESAP. The results of these audits must be provided in the monthly E&S reports to Voltalia.
All workers	
All construction site workers	■ Comply with all HSE requirements; ■ Understand their responsibilities and implement the requirements of this Plan; ■ Participate in site induction training and other relevant HSES related training if required; ■ Report on any activities which demonstrate deviations from – or non-compliance with – this Plan requirements; and ■ Report any incidents, unsafe situation, or issues to their supervisors and stop work on the grounds of danger to life or the environment and report this immediately to the Site Manager.

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

4.0 MITIGATION MEASURES/ACTIONS AND MONITORING ACTIVITIES

The following table (Table 4-1) details the environmental management and mitigation measures/actions identified for OHS-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 OHS 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 HSES manager will evaluate the situation and, if needed, propose changes and integrations to the mitigation and monitoring activities included in the present Plan. The proposed changes will be evaluated and approved by the Voltalia’s Project Manager who will also ensure that action/measures and monitoring activities are carried out timely and adequately.

Table 4-1: Mitigation measures/actions for construction phase.

Mitigation measure						Monitoring activities		
Item	**Mitigation Measures/Actions**	**Timeline and frequency**	**KPI**	**Target**	**Responsibility**	**Verification method**	**Frequency**	**Responsibility**
OHS-1	**<u>Minimization: OHSMP Dissemination</u>** ▪ Develop, implement and disseminate the OHS MP for the construction phase of the Project. ▪ The OHSMP covered: (i) OHS organisation and workers induction and training, (ii) Personal and collective protective equipment, (iii) Works requiring prior permit, authorization or approval, (iv) Traffic regulation and heavy machinery movement within worksites, (v) Works in excavations, (vi) Outdoor activities restrictions under dangerous weather conditions, (vii) Electrical live systems safety, (viii) First aid & Emergency response, (ix) OHS monitoring, (x) Non-compliances management and continuous improvement.	Pre-construction and during all period of construction phase	The OHSMP is adopted, implemented and disseminated to EPC Contractor/subcontractors prior to start of construction activities.	All Project workers are provided with a copy of the updated OSHMP	Owner HSE Coordinator EPC Contractor HSES Manager EPC Contractor Health & Safety Site Supervisor	**<u>Monitoring activities:</u>** ▪ Conduct periodical internal audits, to ensure that the plan is known at all levels of the organization and implemented; ▪ Records of OHSMP disseminated; ▪ Keep the records of the internal audits; ▪ Update of the OSHMP to ensure compliance throughout the construction phase.	Monthly during the construction	EPC Contractor E&S Specialist
				100% dissemination of the Plan among workers and staff involved in OHS activities				
			The OHSMP covered OHS organisation and workers induction and training.	All Project workers are given workers' induction training during induction				
				All Project workers are familiar with the OHS organisation structure				
			The OHSMP covered personal and collective protective equipment.	All provisions of personal and collective protective equipment are included in the OSHMP				
			The OHSMP covered works requiring prior permit, authorization or approval.	All the necessary permits, authorizations and approvals are correctly tracked in a dedicated OHS register				
				Zero (0) frequency of works starting without the necessary permits, authorizations or approvals				
			The OHSMP covered outdoor activities restrictions under dangerous/extreme weather conditions.	A list of outdoor activities, which are prohibited/restricted during dangerous weather conditions are included in the OSHMP				
				Zero (0) frequency of outdoor activities				

Mitigation measure						Monitoring activities		
Item	**Mitigation Measures/Actions**	**Timeline and frequency**	**KPI**	**Target**	**Responsibility**	**Verification method**	**Frequency**	**Responsibility**
				being carried out under dangerous weather conditions				
			The OHSMP covered electrical live systems safety	All the relevant requirements for safety rules related to electrical live systems are included in the OHSMP (100%)				
				All safety rules relevant to electrical live systems are correctly implemented throughout the construction sites (100%)				
			The OHSMP covered first aid & Emergency response	Information on first aid and emergency response is included in the OHSMP				
			The OHSMP covered OHS monitoring, non-compliances management and continuous improvement.	OHSMP is continuously updated to ensure compliance with OHS requirements				
			All EPC Contractor/Subcontractor's OHSMP reviewed and approved by Owner (prior to implementation)	Owner reviewed all 100%				
OHS-2	**<u>Minimization: Healthcare infrastructure and services</u>** ▪ Identification of the healthcare facilities in the surroundings to be used in case of workers' accidents, with the aim of avoiding additional pressure on existing structures.	Pre-construction and during all period of construction phase	Healthcare facilities within the Social AoI identified for use during the Construction Phase.	All available healthcare facilities within the AoI have been identified in case of need	EPC Contractor HSES Manager EPC Contractor Health and Safety Site Supervisor	**<u>Monitoring activities:</u>** ▪ Verify that healthcare facilities have been identified. ▪ Keep the records of the internal audits.	Once during pre-construction and Monthly during construction phase	EPC Contractor E&S Specialist
OHS-3	**<u>Minimization: Employees' OHS awareness and training</u>**	Pre-construction and during construction phase	All personnel are properly trained in OHS management during construction phase.	All Project personnel (100%)	EPC Contractor HSES Manager	**<u>Monitoring activities:</u>**	Monthly during the entire construction phase	EPC Contractor E&S Specialist

Mitigation measure						Monitoring activities		
Item	**Mitigation Measures/Actions**	**Timeline and frequency**	**KPI**	**Target**	**Responsibility**	**Verification method**	**Frequency**	**Responsibility**
	▪ All personnel will be trained in proper OHS management during construction phase, taking into consideration all the OHS hazards including their level of responsibility and duties.			trained in OHS management	EPC Contractor Health and Safety Site Supervisor	▪ Verify that workers have been trained about mitigation and monitoring measures. ▪ Keep on-site a detailed training register. ▪ Keep the records of employees trained in OHS management and make them available for review.		
			OHS management trainings includes OHS hazards and personnel's responsibilities during hazardous events.	All Project personnel (100%) trained in OHS hazards and responsibilities				
			Records of workers trained	Register includes all Project workers trained in OHS management				
			Percentage of workers trained in OHS management have passed the OHS management test.	All workers (100%) have passed the OHS management test				
			Percentage of workers trained on the proper use of PPE during construction	All workers (100%) trained on how to use PPE				
			Percentage of workers provided with PPE	All workers (100%) provided with suitable PPE				
OHS-4	**<u>Minimization: Protection against unfavourable weather conditions</u>** ▪ Workers' exposure to extreme weather conditions such as heat waves and cold fronts (subzero temperatures): EPC contractor to monitor extreme weather (hot and cold fronts) related incidents and ensure that (i) workers in the warm seasons are provided with shaded places to rest/eat and with sufficient cold drinking water; (ii) workers in cold seasons are provided with enough clothing and heating to combat the cold weather.	Pre-construction and during all period of construction phase.	Percentage of workers provided with adequate protection against unfavourable weather conditions (e.g., heat waves)	All workers (100%) provided with suitable protection	Owner HSE Coordinator EPC Contractor HSES Manager EPC Contractor HSES Manager EPC Contractor Health and Safety Site Supervisor	**<u>Monitoring activities:</u>** ▪ Verify that workers have been trained about how to deal with extreme weather conditions. ▪ Keep on-site a register of weather conditions. ▪ Track number of days under extreme weather conditions and protection provided under such circumstances. ▪ Keep the records of employees trained in OHS management and make them available for review.	Monthly during the entire construction phase	EPC Contractor E&S Specialist
			EPC contractor have monitored heat related incidents and ensured that workers are protection such as in the warm season are provided with shaded places to rest/eat and with sufficient cold drinking water and heating during cold conditions.	% of extreme weather monitoring = 100%				
				Recorded days of extreme weather conditions vs protection put in place for workers = 1:1				
			Workers suffering extreme weather conditions due to lack of protection during construction phase	Zero (0) occurrence				
OHS-5	**<u>Minimisation: Provide Health Induction Training</u>**	Pre-construction and during construction phase	Percentage of workers attended the health induction training.	All workers (100%) trained.	Contractor HR Manager Owner HSE Coordinator Contractor HSES Manager	**<u>Monitoring activities:</u>** ▪ Verify that workers have been trained on STIs,	Monthly during the construction phase.	EPC Contractor E&S Specialist

Mitigation measure						Monitoring activities		
Item	**Mitigation Measures/Actions**	**Timeline and frequency**	**KPI**	**Target**	**Responsibility**	**Verification method**	**Frequency**	**Responsibility**
	▪ Provide health induction for workers and awareness trainings on STIs, communicable and non-communicable disease prevention, Awareness on healthy lifestyles, alcohol, personal and food hygiene, etc.					communicable and non-communicable diseases. ▪ Conduct periodical internal audits and routine medical checks for all workers.		
OHS-6	**<u>Minimisation: Management of STDs/HIVs/alcohol consumption/general health issues</u>** ▪ Provide health advice and services (health checks and alcohol control) during the Construction phase	Pre-construction and during construction phase	Cases of Sexually transmitted diseases amongst the workers	Zero (0) occurrence	Owner HSE Coordinator EPC Contractor HSES Manager EPC Contractor HSES Manager EPC Contractor Health and Safety Site Supervisor	**<u>Monitoring activities:</u>** ▪ Verify that workers have been trained about mitigation and monitoring measures. ▪ Keep on-site a detailed training register. ▪ Track number of days under extreme weather conditions and protection provided under such circumstances. ▪ Keep the records of employees trained in OHS management and make them available for review.	Monthly during the entire construction phase	EPC Contractor E&S Specialist
			Periodic screening of STDs are provided free of charge during the construction phase	All workers (100%) subject to health screening				
			Random alcohol checks were conducted on workers	All workers (100%) went through at least one random alcohol check				
OHS-7	**<u>Enhancement: Workers' Health Screening</u>** ▪ Perform a health screening of all workers prior to beginning of work and on a periodic basis.	Pre-construction and during all period of construction phase	Percentage workers going through health screening before starting their jobs.	All workers (100%) subject to health screening.	Owner HSES Team Medical Doctor / General Practitioner (GP)	**<u>Monitoring activities:</u>** ▪ Conduct periodical internal audits, to ensure that health screening is implemented and records of usage/visits; and, ▪ Keep the records of the internal audits.	Monthly during the construction phase.	EPC Contractor E&S Specialist
OHS-8	**<u>Minimisation: OHS Management during Construction phase</u>** ▪ Ensure that adequate measures are in place for the following:	Pre-construction and during construction phase	Percentage of workers trained in Manual Handling	All workers (100%) trained	EPC Contractor HSES Manager EPC Contractor HSES Team EPC Contractor E&S Supervisor	**<u>Monitoring activities:</u>** ▪ Conduct periodical internal audits, to ensure that the all OHS aspects are followed according to guidelines, procedures and requirements; and,	Monthly during the construction phase.	EPC Contractor E&S Specialist
			Frequency of non-compliance against the minimum Manual Handling requirements	Zero (0) occurrence				
			Percentage of workers trained before handling/	All workers (100%) trained before				

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
	- Manual handling - Correct use of Plant and Equipment - Management of hazardous substances - Compliance with occupational noise and vibration standards - Compliance with dust management standards - Provide PPE and ensure the correct usage - Management of drugs and alcohol - Housekeeping standards - Address adverse weather conditions - Ensure correct/sufficient workplace lighting.		operating heavy mobile plants	operating heavy mobile plants		▪ Keep the records of the internal audits.		
			Frequency of non-compliance against the minimum Plant and Equipment requirements	Zero (0) occurrence				
			Percentage of workers involved in chemical activities (i.e., handling, use, storage and management trained in the use of the available information (such as SDS), safe work practices, appropriate use of PPE, and chemical spill response.	All workers (100%) involved in chemical activities properly trained.				
			Register of hazardous materials present onsite compiled from the Safety Data Sheet (SDS) are maintained and updated.	Registers always kept up to date.				
			Occupational exposure of workers to noise and vibration levels in the workplace as a direct result from work have been considered and properly addressed.	Exposure of workers properly addressed				
			Statutory limits for noise exposure (generally weighted for an 8-hour exposure period) have been identified for compliance purposes.	Zero (0) occurrence of exposure beyond statutory limits				
			Noise and vibration exceedances from the statutory limits	Zero (0) occurrence of exceedances of limits				
			The following control measures hierarchy were implemented, for the following: ▪ Eliminate/Reduction of the noise or vibration.	Control measures implemented according to hierarchy				

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
			▪ Isolation and insulation of the work area from the source. ▪ Limiting the period of exposure. ▪ Use of hearing protection PPE. ▪ If needed, the monitoring of the exposure of employees through a sampling program					
			Control measures are put in place for dust generation during construction phase	All control measures implemented				
			Frequency of dust exceedances from the allowable limits during construction.	Zero (0) occurrence of exceedances				
			Protection for workers exposed to workplace hazards such as facility controls and safety systems in addendum to PPE have been put in place and implemented.	All necessary protections implemented				
			Frequency of workers breaking any of the following rules: ▪ No alcohol is allowed to be consumed before and during working hours. ▪ No illegal drugs shall be consumed or permitted on property at any time or under any circumstance. ▪ No person who is under the influence of alcohol or drugs is allowed onsite. ▪ Workers who are taking prescription medication that may affect their safety at work (that cause drowsiness), are to inform their supervisors of the circumstances so that appropriate duties may be assigned.	Zero (0) occurrence of workers breaking rules				

Mitigation measure						Monitoring activities		
Item	Mitigation Measures/Actions	Timeline and frequency	KPI	Target	Responsibility	Verification method	Frequency	Responsibility
			Frequency of lost time accidents (including First Aid Cases, Medical Treatment, etc.) at work sites during construction phase.	Zero (0) occurrence of lost time accidents				
			LTI rate is regularly updated, and includes temporary workers and/or subcontractors' workers in the calculations.	LTI rate continuously kept updated				
			General housekeeping (minimum requirements) standards are maintained	Standards maintained in all workplaces				
			Workplaces are provided with adequate lighting	All workplaces provided with adequate lighting				

5.0 RISK MANAGEMENT

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

5.1.1 Risk Assessment

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

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

The Site Management Team will be responsible for preparing an overarching and high-level risk assessment for the Project before the site mobilization begins. This assessment will be continually updated and accomplished by completing the following two documents:

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

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

5.1.2 Risk Assessment and Method Statement (RAMS)

In addition, for any Project related works involving high-risk activities, a Risk Assessment and Method Statement (RAMS) shall be prepared by following the template provided in **Appendix I – Risk_Assessment_&_Method_Statement_Template** of the Voltalia's HSES Management Plan. This will be submitted for review to the HSE Technician and the Site Manager no later than a week prior to starting the activities described in the work method statement.

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

5.1.3 High Risk Activities

All control measures arising as an outcome from the Risk Management process shall be followed by the Site Management Team and Contractors. As minimum the compliance with Voltalia' s HSE Minimum Requirements (VMR) applicable specifications shall be ensured for all performed High-Risk Activities. The VMR are accessible in the Voltalia Intranet on the HSE HUB and made available to Contractors prior to their engagement on-site.

The following table identifies the project High-Risk Activities to be considered, and their cross relation with applicable sections of the VMR:

Table 5-1:Project High Risk Activities List and VMR Reference

High-Risk Activity	VMR Section
Works on systems handed over to Commissioning. Works on live equipment or in their vicinity zone. Works in the live working zone of electrical equipment. Overhead Line works.	10.7. Electrical Safety for Medium and High-Voltage Systems 10.8. Electrical Safety for Low Voltage Systems 10.9. Electrical Safety – Induced Voltage in HV Sub-Station 10.10. Electrical Safety – Trapped/Capacitive Charge in HV Equipment 10.11. Electrical Safety – Electrical Equipment 10.13. Electrical Safety - Testing of High Voltage Equipment
Works for which Lock-Out / Tag-Out (LOTO) must be performed.	10.12. LOTO (Lock Out / Tag Out) for Isolation of Source of Energy 10.44. Live Systems & LOTO
Excavation works.	10.14. Excavations – Buried Services 10.15. Excavation Works – Digging the Excavation 10.16. Excavations – General Requirements After Digging 10.17. Excavations – Unstable Ground and Risk of Sinkhole 10.18. Excavations - Access / Egress
Works in potentially hazardous atmospheres (including but not limited to oxygen-enriched, oxygen-deprived, flammable, or explosive, toxic atmospheres).	10.20. Hazardous Atmospheres 10.2. Areas with potentially explosive atmospheres (“ATEX ZONES”)
Hot works.	10.23. Hot Works
Works at height. Working on or near floor openings. Working on roofing. Erection, modification and dismantling of scaffolds.	10.24. Work at Height – General Requirements 10.25. work at Heights, Ladders - General Requirements 10.27. Work at Heights Ladders - Fixed / Permanent / Vertical ladders 10.28. Work at Height - Mobile Elevating Working Platforms 10.29. Work at Height – Floor Openings 10.30. Work at Height – Guardrails 10.31. Work at Height – Individual Fall-Prevention and Fall-Protection 10.32. work at Height – Working on Roofs 10.33. Work at Height - Scaffolds – General Requirements 10.34. Work at Height - Scaffolds – Safe Design of Scaffolds 10.35. Work at Height - Scaffolds – Erection, Modification and Dismantling 10.36. Work at Height - Scaffolds – Rolling Scaffolds 10.37. Work at Height - Scaffolds – Suspended Scaffolds 10.38. Work at Height – Prevention and Protection Against Falling Objects
Lifting operations.	10.39. Lifting – Accessories 10.40. Lifting Operations – Lift Plans 10.41. Lifting Operations – Equipment 10.42. Lifting Operations – Preparing and Conducting the Lift

High-Risk Activity	VMR Section
Lone working.	10.43. Lone Working
Works in Confined Space.	10.3. Confined Spaces – Identification, access, Prevention and Work Planning 10.4. Confined Spaces – Entry Requirements 10.5. Confined Spaces – Emergency Situations
Works requiring the handling or use of hazardous substances.	10.21. Hazardous Substances – List of Controlled Substances 10.22. COHSS Assessment
Pressure testing with pressurized fluids or gases.	10.48. Plant, Equipment and Machines – Compressed Gas Cylinders

If during the project additional High-Risk Activities are identified these will be included as object of management in accordance with the **HSES MP, section 5.3 - Risk Management**.

5.1.4 High Risk Work Permits

All the identified High-Risk activities of the Project will be subject to the rules defined in Section 5.4.3 of the Voltalia's HSES Management Plan. These high-risk activities shall be subject to a specific Permit-To-Work (PTW) procedure, identifying the interveners, their competences and authorizations. The list of considered activities are found in Section 7.1 of the Voltalia's HSES Management Plan. This list is not exhaustive, and any other high-risk activity identified should be subject of a PTW.

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

5.1.5 Interface Management and Management of Change

Considering that the simultaneous execution of two or more tasks in a shared space may have varying impacts on each other and potentially lead to unsafe conditions, Voltalia will implement an interface management process, to prevent the accumulation of hazards within the same area or system. The interface management process will be of responsibility of the Site Management Team. More information about the implementation procedures is found in Section 5.4.4 of the Voltalia's HSES Management Plan.

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

6.0 INCIDENT MANAGEMENT

All good catches and incidents that cause or have the potential to cause personal injury or damage to property or the environment shall be reported and investigated to prevent its re-occurrence. Voltalia has an Incident Management Procedure accessible in the Voltalia Intranet on the HSE HUB. This procedure provides information on how to achieve the minimum standards to ensure HSE Incidents are identified, reported, and investigated in a consistent and effective manner. Its purpose is to ensure:

- All Incidents, including near misses and HSE Good Catches, are reported, investigated, and analyzed to identify where management controls failed and recommendations to identify new or restore controls are implemented.
- Early sharing of learning´s to facilitate prompt corrective and preventive actions where similar situations are found to prevent a recurrence both locally and at other locations.

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

7.0 AUDIT AND REVIEW

The correct implementation of this Plan is verified through internal inspections. The schedule, the frequency, the scope and objectives of the inspections as well as the responsible internal auditors shall be selected on the basis of Section 11 of the Voltalia's HSES Management Plan (Performance Measurement and Monitoring).

Internal auditing shall address:

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

Evidence and results of the inspection activities shall be formally recorded on the dedicated inspection tool accessible on the Voltalia Intranet through the HSE HUB. Any Non-Conformity and Preventive/Corrective actions identified during the inspections must be tracked to ensure suitable close out.

Voltalia's HSES Manager will review results of inspections and the progress of the implementation of any Preventive/Corrective actions.

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

Additional details related to the construction phase of the Project are expected in due course; it is therefore recommended that this Plan is subject to a systematic review process during the construction phase in order to encompass and consider any information relevant to OHS 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 OHS related activities, (whichever happens sooner). Revision of this Management Plan will be the responsibility of the Project Manager, in collaboration with the HSE Manager, who is in charge of this Plan's implementation.

8.0 TRAINING REQUIREMENTS

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

8.1 HSE Induction

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

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

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

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

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

- HSES Policy and Golden Rules of Voltalia Group;
- The roles and responsibilities for HSES in relation to the implementation of this Plan;
- Standard site rules;
- Arrangements for first aid, welfare facilities, fire and evacuation, accident, and incident (near-misses and good-catches) reporting;
- Gate security the need for HSE cards to access;
- Access to toilets, water, clinic, ambulance and emergency meeting point;
- Dedicated grievance mechanisms for workers or community, accessible by phone, mail or walk in;
- Key safety signs: live electricity, no access, first aid, speed reduction, maximum speed, etc;
- Use, storage, and maintenance of the PPEs to be used: helmet, mask, vest, safety shoes, etc;
- Emergency procedures and contacts;
- Project specific HSES requirements / mitigation / control measures;
- Projects abide by international HSE best practice; violating staff shall be subject to disciplinary actions according to the Voltalia disciplinary action matrix;
- Mitigation measures for the risks and impacts including those applicable to Traffic, such as:
  - Staying within cordoned pedestrian lanes;
  - Speed limits on roads and on-site;
  - Community awareness and cautioning;
  - If applicable the need to always stay seated in your bus seat with seatbelt fastened;

- The workers responsibility to ensure mitigation measures all properly applied by all workers and drivers;
- Delimitation of Rest areas for drivers;
- Absolute “do nots” for the Project (drugs, weapons, sexual harassment, discuss religion).

Should there be any substantial changes in the Project activities related to traffic, then the workers shall receive additional training on the basis of the new information.

8.2 Specific Training

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

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

8.3 Risk Assessment and Method Statement (RAMS) Training

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

8.4 Toolbox Talks

Regularly scheduled brief meetings or training sessions facilitated by Voltalia or Contractors aim to address specific and pertinent HSES topics with workers. The objective is to enhance awareness, disseminate crucial information, and strengthen adherence to HSES work practices. The Site Management Team may mandate these sessions for Contractors, focusing on specific topics in response to identified needs or observed shortcomings on the site.

9.0 REPORTING

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

9.1 Reporting of the monitoring activities

Evidence and results of the monitoring activities (detailed in Table 4-1) must be described in detail in appropriate monitoring reports to be prepared as frequent as indicated in the table. These monitoring reports must include the following minimum information/data (where relevant):

- Scope and Purpose of the monitoring activity;
- Reference to the approved OHS MP.
- Description of the monitoring effort and applied methodology, including start and end dates of the monitoring period covered by the report, location of monitoring activities (geographical coordinates in WGS84 system and elevation) and map of surveyed areas;
- Timing of data collection (start date and end date);
- Applicable KPI according to Table 4-1.
- Conclusions on compliance vs. KPI, and eventual observations including the reasons for the deviations, if applicable;

- Name and personal data of staff responsible for implementing the specific monitoring activities (including reference to this Management Plan and reference to the appointment of third parties eventually contracted to perform part of the activity, e.g. external laboratories and consultants);
- Implications, modifications, adjustments and/or recommendations that could be adopted in response to observed results from the monitoring activities and any other recommendations for improvements to the OHS MP;
- Suggestions for future projects based on lessons learned;
- Quality control procedures applied to ensure consistency and reliability of the analyses or results;
- Analytical certificates from the laboratory/ies (where applicable).
- Summary of any OHS-related incidents or accidents, Analysis of the root causes and lessons learned, and documentation of any corrective actions taken.

9.2 Reporting of the auditing activities

The implementation of this Management Plan must be audited according to the requirements included in Voltalia's E&S Management System and section 7.0 "Audit and Review" of this Management Plan.

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

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

9.3 Incident and good-catch reporting

All good catches and incidents that occur in the Project Accommodation and that cause or have the potential to cause personal injury or damage to property or the environment shall be reported and investigated to prevent its re-occurrence. The reporting shall follow the methodology as explained in the Voltalia HSES Management Plan **"Good-Catches and Incident Registry" – Appendix U** and following the form available in: **"Accident & Incident Immediate Report – Four Blocker" – Appendix V**, for the immediate registry of an incident.

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

1) The initial investigation (fact finding and interviews) should be completed within 24 hours of the accident;

2) An event Investigation Report shall be completed and shall include:

   - Root Cause Investigation methods should be used to identify the causal factors of the incident and associated root causes;
   - Details of incident reported e.g., brief overview of the incident, date, time and location;
   - Key findings and recommendations;

- Identification of individuals involved and affected;
- Documentation and evidence;
- Collection and presentation of relevant documents e.g., work permits, safety procedures and equipment manuals;
- Photographic evidence, videos or sketches that illustrate the incident scene and conditions;
- Details of regulatory compliance (national and international) including WBG ESH standards;
- Injuries and damages – detailed information on injuries, fatalities and property damages;
- Medical treatment provided and follow-up actions; and,
- Recommended corrective actions that are designed to prevent re-occurrence.

3) A copy of the Incident Investigation Report shall be kept on file at the Site or in an online platform accessible on site;

4) A signed copy of the final report must be made available to **Voltalia´s HSE department** personnel for regulatory reporting, workers' compensation, and trend analysis purposes;

5) All lost time injury, medical treatment injuries first aid injuries, must also be notified to **the Site Owner** within 24 hours of the incident occurring. Further within 5 business days of the injury an interim report must be made to the **Site Owner**, which gives full details of the injury and interim recommendations for prevention of a recurrence. Finally, within 10 business days of the injury, a final full written report must be sent, which gives complete details of the injury and formal recommendations for prevention of a recurrence.