

## ENVIRONMENTAL AND SOCIAL ACTION PLAN FOR DNEPRO-BUGSKIY WIND POWER PLANT

No.	Action	EHS and Social Risks Liability/ Benefits	Legislative, lenders requirement or best practice	Resources/ Responsibility	Target and Evaluation Criteria for Successful Completion	Time-frame
<b>PR 1. Environmental and Social Appraisal and Management</b>						
1.1	Develop and implement an Environmental, Health and Safety Management System (E/SMS) for the wind farm operations in line with the requirements of ISO 14001 and ISO 45001 standards Appoint designated EHS manager and provide resources for implementation and monitoring.	Management of EHS risks and impacts	EBRD PR1 ISO 14001 ISO 45001 National regulations	Staff time, training cost Top management, EHS Manager	EHS manager appointed and resources provided  EHS procedures and developed and implemented	Prior to Disbursement  Q-4, 2019
1.2	Under the community development support program to provide an annual budget (agreed at 150 thousand euro per annum) to the local community/council for the implementation of the priority community needs.	Community support and community benefits from the project	Best practice EBRD	Financial resources to be agreed with Company's management	<del>CSR developed and implemented</del>	Annually
1.3	Include into tender documentation and Contractor's contract a provision on compliance with Client's E&S requirements and full compliance with national legislation to be met during the project implementation. Select contractors that demonstrate adequate capability in EHS and labour management including managing sub-contractors. Request contractors to develop an EHS plan agreeable to the Company before starting any activities. Audit the contractor adherence to the EHS aspects of the contract, ensure timely correction of deviations.	Work delays/ Good relations with authorities	EBRD PR1 ISO 14001 ISO 45001 Ukrainian norms norms (SNiP, SanPiN, GOST), sectoral guidelines	Internal resources	Tender documents include ESP requirements. Criteria for assessing contractors EHS and labour management capabilities established. Contractor EHS plan approved by the Company	During tender process
1.4.	Implement the Environmental and Social Management and Monitoring Plan, ("ESMMP") prepared by the Consultant, which can be changed from time to time on a none objection basis of the Lenders. Implement all conditions of EIA studies and Environmental decisions/permits.	Management of EHS risks and impacts Compliance with EIA regulation requirements	EBRD PR1	Internal resources and contractors	All provisions of ESMMP implemented	Continuously

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1.5.	Provide to the Lender(s) information on the Environmental, Social, Health and Safety matters as part of an Annual Environmental and Social Report (AESR)	Compliance with EBRD ESP	EBRD PR1	Internal resources	AESR submitted	Q-1 of each year following the reporting period
1.6.	Conduct a periodic EHS audit (after construction and then every 3 years) of the wind farm	Risk monitoring	EBRD PR1	Cost of external consultant	EHS audit report	Q-1, 2020 and every 3 years
<b>PR 2. Labour and working conditions</b>						
2.1	Ensure that contractor and its subcontractors have a worker representative and a human resource policy which is disclosed to workers. Provide a grievance mechanism accessible to all project related workers with the ability to complain anonymously, and include in each answer a roadmap for an unsatisfied worker to take the grievance further.	Better worker relations and company image among the local community	EBRD PR2 ILO	Internal resources	Grievance mechanism implemented	Within 3 weeks of construction start
2.2	Include clauses into the EPC contract requiring the EPC contractor to develop and implement Construction Management EHS plan to ensure that labour management practices required under the national legislation and PR2 are cascaded down to its employees, sub-contractors and key suppliers.	Decreased forced and child labour risks in client's contracting chains	EBRD PR 2	Internal resources	Contractor Management Plan implemented	Prior to construction
2.3	Incorporate provisions prohibiting the use of forced/child labour in all contractors', sub-contractors', and key suppliers' contracts.	Decreased forced and child labour risks in client's contracting chains	EBRD PR2	Internal resources	Provisions prohibiting the use of child/forced labour included in contractor/sub-contractors' contracts	Prior to construction
2.4	All temporary accommodation facilities should be built to meet the standards of the national legislation and IFC/EBRD Guidelines: Workers Accommodation: Processes and Standards	Increased safety and better working conditions for workers	National legislation and EBRD PR2	Internal resources	Site inspection	Within 6 weeks of construction start
<b>PR 3. Resource Efficiency and Pollution Prevention and Control</b>						
3.1	Request and control the contractor to fully adhere to the ESMMP plan during construction works	Reduced environmental and social impacts	EBRD PR 3	EHS Manager	Checks/audits record show that the plan is followed	Continuously
3.2	Undertake a noise assessment upon completion of the wind farm, with a focus on residential areas. If needed developed mitigation action plan, agree this with Lenders	Reduced noise impacts	EBRD PR 3	EHS manager Cost of noise monitoring	Noise assessment report	Within 3 months of the WPP operations

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	and implement. If elevated noise then develop a mitigation action plan to ensure compliance			toring		start
<b>PR 4. Health and Safety</b>						
4.1	Request the contractor to develop site specific HS plan with identification of risks and to transfer its OHS policy and system requirements to subcontractors through regular HS audits	Work site specifics and risk of rare accidents with severe consequences may be overlooked	EBRD PR 4 ISO 45001	EHS Manager	OHS documentation shows that subcontractors HS performance effectively controlled	Plan before construction, audit records during construction
4.2	For all high-risk works add site specific risk assessments in the local permit-to-work system Enforce registration of near misses with internal root cause analysis and corrective measures	Risk generated by unusual conditions could be missed by HS instructions Electrocution without quick aid may lead to death or permanent disability	EBRD PR 3 Legislative requirements	EHS Manager	Risk assessment and work permit provisions are in place	Before operation starts
4.3	Prepare site specific health and safety and emergency response plans for construction, operation and decommissioning and disclose it to relevant stakeholders. Integrate local fire brigades into the second tier response and arrange sufficient firewater replenishment.	Risk of injuries and deaths and chronic obstructive pulmonary disease in welders	Ukrainian regulations Best practice	Procurement department EHS Manager	Emergency plan is in place and stakeholders aware; Fire suppression arrangement are implemented	Before operation starts Before decommissioning for specific ERP
<b>PR 5. Land Acquisition, Involuntary Resettlement and Economic Displacement</b>						
5.1	Implement Livelihood Restoration Plan agreed with the Lender	Land users complaints /Project related livelihood losses minimised and compensated	EBRD PR5	Company Resources	LRP implemented and Completion Report submitted for EBRD approval	Prior to construction
<b>PR 6. Biodiversity Conservation and Sustainable Natural Resource Management</b>						
6.1	Fully implement the provisions of the EIA and bird studies. Ensure that an ecological expert is available during the construction process to limit impacts on flora and fauna.	Ensure compliance	National law and EBRD ESP	Company	Compliance	
6.2	Appoint an independent ornithological expert (IOE) to	IOE to review under-	EBRD	External Expert	Monitoring report and	First 3 years of op-

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	<p>undertake additional bird and bat assessment and monitoring during the construction and operational phase.</p> <p>IOE to review and develop further the ESMP for bird monitoring and mitigation measure, such as shut down on demand or turbine speed control under specific conditions</p> <p>The IOE will be able to make recommendations to any operational changes to limit impacts. This will be done in consultation with the Lenders.</p> <p>IOE to be appointed for duration of 3 years, The scope for future monitoring to be agreed with Lenders based on IOE report.</p>	<p>take monitoring and provide recommendations to update the EMP to limit environmental impacts</p>			<p>recomemdnations Updated EMSP</p>	<p>eration</p>
6.3	<p>IOE to conduct post-construction monitoring on the wind farms impact on birds and bats in a period stated in the environmental decisions, but not shorter than three years.</p> <p>The monitoring will include both carcass monitoring as well as physical observations.</p> <p>Monitor birds and bats site usage and mortality. If annual mortality exceeds the industry statistics, implement additional mitigation measures in liaison with EBRD.</p>	<p>Reduction of bird/bat mortality</p>	<p>EBRD PR 6 Best international practices</p>	<p>Independent ornithologist service cost</p>	<p>Monitoring report</p>	<p>As stated in the ESMMP/ESIA decision</p>
6.4	<p>Based on the outcomes of the seasonal bird and bat monitoring and ornithological advice, consider installation of the bird markers, diverters and/or relevant bird mortality mitigation measures, if required</p>	<p>Reduction of bird/bat mortality</p>	<p>EBRD PR 6 Best international practices</p>	<p>Cost of markers/diverters</p>	<p>Markers/diverters installed</p>	<p>Prior to contraction</p>
6.5	<p>Minimize construction impacts through implementation of good practices, such as:</p> <ol style="list-style-type: none"> <li>1. Start work before nesting period (April) to ensure that birds nest elsewhere</li> <li>2. Reduce noisy works at the reproduction period March-June where it is possible</li> </ol>	<p>Nesting birds may abandon their eggs. Temporary displacement of sensitive animals to neighbouring area, increase in competition and pre-</p>	<p>EBRD PR 6 Best international practices</p>	<p>Internal resources</p>	<p>Work schedule accounts for nesting period and the area ecological sensitivity, as appropriate</p>	<p>Prior to construction</p>

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		<p>ation, reduction of food availability and chances for offspring survival / good housekeeping</p>				
<p><b>PR 10. Information Disclosure and Stakeholder Engagement</b></p>						
<p>10.1</p>	<p>Implement the Stakeholder Engagement Plan with the grievance mechanism and update it annually.</p> <p>Min once a year hold a meeting with local community to provide information on operations.</p> <p>Conduct information dissemination and meeting with surrounding stakeholders to increase awareness on the future construction in their area and potential impacts, and availability of grievance procedure if they have any issues/concerns.</p> <p>Publish on web site the results of the IOE review within 3 years of operation of wind farm, and provide any infraction on bird monitoring to experts undertaken Strategic Assessment/Review of wind development in Southern Ukraine.</p>	<p>Community issues identified and expectations managed</p>	<p>PR 10 IFC guidelines on stakeholders engagement</p>	<p>Internal resources</p>	<p>SEP and grievance implemented in full</p>	<p>Q-3, 2019</p>