



Vifor Wind Farm

Operational Environmental and Social Management Plan (OESMP)

Project Owner: **Rezolv Energy**



Project Company: **First Look Solutions SRL**

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ABBREVIATIONS

A&E	Accident and emergency
AIS	Air-Insulated Switchgear
AOI	Area of Influence
BMP	Biodiversity Management Plan
CC	Civil Code
CHS	Community Health and Safety
CLO	Community Liaison Officer
CPCS	Central Power Collection Station.
E&S	Environmental and Social
ESHS	Environment, Social Health and Safety
EIA	Environmental Impact Assessment
EPRP	Emergency Preparedness and Response Plan
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESP	Environmental and Social Policy
EU	European Union
FC	Financial Close
GBV	Gender-Based Violence
GIIP	Good International Industry Practice
GM	Grievance mechanism
H&S	Health and Safety
HPZ	Health Protection Zone
HR	Human Resources
IFC	International Finance Corporation
ILO	International Labour Organisation
IUCN	International Union for Conservation of Nature
LTIFR	Lost Time Injury Frequency Rate
MSDS	Material Safety Data Sheets
NSR	Noise Sensitive Receptors
NTP	Notice to Proceed
NTS	Non-Technical Summary
O&M	Operations and Maintenance
OESMP	Operations Environmental and Social Management Plan
OHS	Occupational Health and Safety
OHTL	Overhead Transmission Line
PPE	Personal Protective Equipment
PS	Performance Standard
RoW	Right of Way
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SS	Substation
TRI	Total Recordable Injury
TRIFR	Total Recordable Injury Frequency Rate
UCLs	Underground cable lines 33 kV
VWF	Vifor Wind Farm
WTG	Wind Turbine Generators

1 Introduction

1.1 Context

This Operational Environmental and Social Management Plan (OESMP) presents the requirements for implementation, management and monitoring of the O&M phase environment, social, health and safety (ESHS), security and labour requirements for the VIFOR Wind Farm (“VWF” or “Project”) in Buzău County, Romania.

The developer is Rezolv Energy (the “Owner”), an independent clean energy power producer. Rezolv Energy uses a special project vehicle (SPV) named First Look Solutions S.R.L. as the entity responsible for the development, construction and operation of the Vifor Wind Farm (VWF) (“FLS” or the “Project Company”)

According to the International Finance Corporation (IFC), the Project is classified as Category A, meaning that an Environmental and Social Management System (ESMS) must be implemented to carry out the mitigation, management, and monitoring measures identified during the ESIA process.

A separate ESMS Manual for the operations phase is available and should be read in conjunction with this OESMP.

The OESMP is to also be read in conjunction with the other dedicated management plans developed by FLS: Biodiversity Management Plan (and supporting plans), Livelihood Restoration Plan, Stakeholder Engagement Plan.

1.2 Objective

The objective of this OESMP is to outline the actions to be taken by FLS or its Contractors during operation, including:

- To set a framework for operational obligations for ESHS, labour and security management.
- Conform to all applicable laws, implementing regulations, financing institution obligations, permit obligations as defined in the Project ESIA/EIA and good international industry practice (GIIP).
- Minimise undue harm or damage to natural resources, life (including human and wildlife), property, sites, structures.
- Consider nearby communities and honour commitments made in community disclosure and consultation activities.
- Adopt a philosophy of continuous improvement and compliance.

1.3 Scope

This OESMP applies to the Project Company, and the O&M Contractors (including their sub-contractors and third-party consultants) collectively described as the O&M Contractor or O&M Contractors, covering servicing and maintenance of the turbines, substation, the project roads and the site security.

The OESMP applies to the operation and maintenance (O&M) phase and impacts resulting from activities connected with the O&M of VWF. Decommissioning impacts will be addressed at the relevant time.

1.4 Project summary

The Project is located in Buzau County, south-east of Buzau City, on the administrative territory of Costești, Gherăseni, Smeeni, Luciu and Țintești communes, being located mainly in Călmățui River meadows. The site is in an area of dry and salt steppes and pastures, partially overlapping the Natura 2000 sites ROSCI0259 Valea Călmățuiului and ROSPA0145 Valea Călmățuiului.

The Project extends on a total area of approximately 2,869 ha, has a total capacity of 460.8 MW and comprises 72 EnVentus Vestas V162 type wind turbine generators (WTGs) of 6.4 MW each – see Figure 1 below.

The underground cable lines 33 kV (UCLs) will connect the WTGs with each other and with the Central Power Collection Station (CPCS). The UCLs will be located along the existing roads and additional access roads, up to 2.0 m depth over a length of approximately 70 km to the transformer station located in the CPCS.

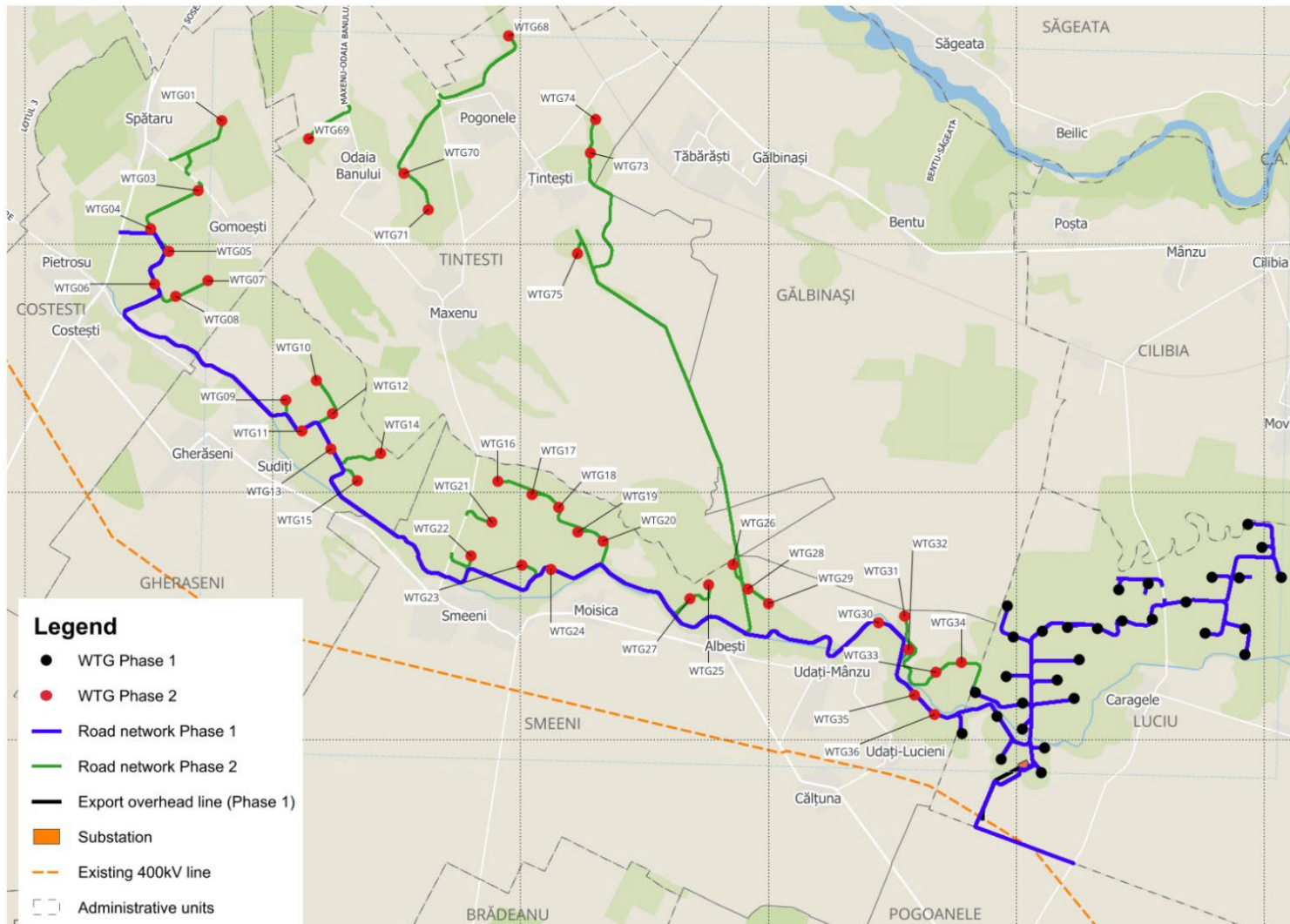
The CPCS will be connected to the 400 kV OHL Cernavoda - Stâlpu Line, belonging to CNTEE Transelectrica S.A., through a 1.2 km long overhead line (OHL), supported by 8 pylons, to the national grid. The VWF will use a network of existing agricultural roads and newly built access roads, along which the underground cable lines are also routed. A Project location map is provided in Figure 1.

The VWF Project is developed in two phases. The first phase of the Vifor Wind Farm will install 192MW in capacity and is scheduled to be commissioned in April 2026. The development, which is located on the administrative territory of Luciu Commune, includes the construction of the 400/33 kV transformer substation and the installation of 30 Vestas V162 wind turbines, access roads (including in Smeeni, Gherăseni and Costești), culverts and the construction of two bridges over the Călmățui River.

The second phase of the Vifor wind farm will add a further 42 turbines, increasing the project's capacity to 461MW. The turbines will be situated in the communes of Smeeni, Gherăseni, Costești and Țintești (21 in Smeeni, seven in Gherăseni, seven in Costești seven in Țintești). Phase 2 will also include the construction of power grid infrastructure and access roads, as well as road bridges and footbridges to support both construction and long-term maintenance. Construction works for Phase 2 begun in January 2026, with the full project scheduled for commissioning in September 2027.

The operational lifetime of the Vifor Wind Farm will be a minimum of 25 - 35 years. Maintenance works will be intermittent and within the established Project site. Options will be considered at the end of the infrastructure lifetime to replace or remove all components, and impacts associated with this will be addressed in a separate decommissioning or refurbishment plan, as applicable at that time.

Figure 1 Vifor Wind Farm (Phases 1 & 2)



2 Operational activities

The lifespan of a WTG is indicated at 30-35 years as per the manufacturer's specification. Activities during the Operations and Maintenance phase will involve:

- Ongoing Operation – daily operation will primarily involve surveillance of the fully automated wind farm.
- Scheduled Maintenance – routine servicing of equipment.
- Unscheduled Maintenance – this involves *ad hoc* repairs to equipment
- Project roads repairs and maintenance.
- Site security.

O&M activities will be undertaken in compliance with all ESHS requirements and will include:

- Scheduled WTG preventative servicing / maintenance (typically every 4 to 6 months), including: visual inspections of the rotor components, tower structure, nacelle housing, generator and gearbox; lubrication of bearings; gearbox checks; electrical system testing and sensor monitoring.
- Annual WTG and CPCS inspections (at least once per year) incorporating a complete mechanical and electrical check-up.
- Conduct equipment cleaning to ensure proper and full safety, functionality and operability of the plant and its components according to the manuals (or as required).
- Unplanned maintenance including repairs when parts fail e.g. replacement of blades, bearings, gearboxes.
- Vegetation Management: Clearing of vegetation under and around WTG pads, substation and access roads to maintain clearances and reduce the risk of wildfire and in line with requirements of the Biodiversity Management Plan to maintain habitats.
- Access Roads Upkeep: Maintenance of access roads and right-of-way to ensure teams and vehicles can safely reach the WTGs and the substation for inspection and repairs year-round.
- Fire Detection and Suppression: Fire alarms and extinguishing systems are tested and maintained to ensure readiness in case of electrical fires.
- Care, custody and control of all the work and all materials and equipment during the operations phase via site security arrangements.

The O&M phase will require a limited number of site-based personnel of up to 15. Service and Maintenance teams will be mobilized depending on the phasing of the works conducted and is not expected to be more than 25 workers at peak activity.

2.1 Operational Site Receptors

The following table highlights the main receptors that are relevant to the O&M phase.

Table 1 VWF receptors - operations

Receptor Type	Operational Site Elements On site	Off site
Machinery	<ul style="list-style-type: none"> • Operations equipment 	<ul style="list-style-type: none"> • Operations trucks/vehicles
Structures & Operations	<ul style="list-style-type: none"> • Wind turbine equipment (towers, rotors, blades, generators) 	
Infrastructure (On site & off-site surface)	<ul style="list-style-type: none"> • Substation Connections • Transmission Lines • Supports foundation (circuits, cabling, switches, etc) • Transformer station • Central power collection station 33 kV/ 400 kV (CPCS) • Electrical Substations • Concrete surfaces associated with infrastructure • Central power collection station 33 kV/ 400 kV (CPCS) • Transmission Lines - Overhead lines (OL), underground cable lines 33 kV (CLs) • Fencing • Culverts 	
Transport	<ul style="list-style-type: none"> • Site Access Roads and newly built roads • Internal roads, parking areas, and walkways 	
Human (staff and community) & animals	<ul style="list-style-type: none"> • Staff working on ground. • Local community & farmers • Animals – sheep, cows, dogs 	<ul style="list-style-type: none"> • Worker's accommodation

3 Applicable standards

The Project must be operated per the national and international regulatory framework defined in this section. All Project Company and O&M Contractors documentation must refer to this framework.

3.1 National E&S legislation and standards

The Project is required to comply with all Applicable Laws, Permits and Codes of Romania. A full list of regulations is provided in Annexe A.

Key regulatory instruments including social issues are as follows:

- Romanian Civil Code establishing the basic rules on real estate transaction and contracts, usufruct rights, tenants' rights and obligations, landowners' rights and obligations towards tenants.
- Law on Cadastre 105/2019.
- Law 350/2001 on Urban Planning and Land Development, successively amended, last time by Law 151/2019, which establishes the objectives, competences and measures for spatial planning
- Law no. 247/2005 on property and justice reform and some accompanying measures, with special references on Legal circulation of land; amended by Decision 597/2020 on the exception of unconstitutionality conditioning the right to compensation of the holders of compensation titles, for his selection of a certain mode of compensation.
- Government Emergency Ordinance 34/2013 on the organization, management and operation of permanent grassland, and amending and supplementing Law 18/1991 on Land Reclamation.

The primary Romanian laws and regulations on workplace health and safety are:

- Law 53/2003 – the Labour Code.
- Law 319/2006 on health and safety at work, amended by Law 198/2018 and Law 208/2021.
- Government Decision 1425/2006 including the methodological norms for enforcement and implementation of Law 319/2006, amended.

The Project will maintain a Project legislation register (refer to the OESMS Manual) that identifies all relevant ESHS and labour legislation.

All O&M activities must observe national, regional, and local environmental laws. This includes obtaining necessary permits, adhering to rights-of-way (ROW) agreements, and periodic reporting to authorities.

The Project Company is responsible for maintaining a VWF Permit Matrix (refer to the OESMS Manual) listing all consents and authorisations required for the O&M of the Project and identifying all additional temporary permits required to execute maintenance works. This may include those regarding chemical use, watercourse crossings, waste management, and protected species.

The Project Company will be responsible for developing a VWF Conditions Matrix (refer to the OESMS Manual) setting out all regulatory conditions and for monitoring compliance with the requirements of the permits and authorisations, including the Environmental Permit for the Operations Phase.

Copies of all permits, consents and authorisations must be always held in Project office.

3.2 International conventions

Relevant international conventions ratified by Romania are summarised below:

- The Kyoto Protocol on Climate Change (UNFCCC)

Romania became a signatory to the UNFCCC in 1998 with a full ascension in 2002. This obligates Romania to assure that the future development in the country meets the conditions of the Convention.

Relevant to the present Project are the requirements associated with the potential generation of greenhouse gas. Further conditions of relevance include:

 - Enhancement of energy efficiency in relevant sectors.
 - Protection and enhancement of sinks and reservoirs of greenhouse gases.
 - Promotion of sustainable forest management practices, afforestation and reforestation.
 - Promotion of sustainable forms of agriculture.
 - Implementation of measures to limit and/or reduce emissions of greenhouse gases; and
 - Limitation and/or reduction in methane emissions.
- The United Nations Convention on Biodiversity 1992 - This Convention seeks to conserve biodiversity and promote its sustainable use. It requires the identification and monitoring of the biodiversity in an area and adopting the necessary conservation measure. Romania become party to this Convention in 1994.
- The Basel Convention 1989 - This was developed under the auspices of the United Nations Environmental Programme (UNEP) in response to the growing worldwide awareness of the problem of international traffic in hazardous waste. The Basel Convention 1998 is the first and foremost global environmental treaty that strictly regulates the trans-boundary movement of hazardous wastes. It obligates parties to ensure environmentally sound management, especially during the disposal process. The objectives of the Convention are to:
 - Ensure that waste is disposed of as near as possible to the place or source of its generation.
 - Reduce trans-boundary waste and where it cannot be avoided, to be disposed of in an environmentally sound and efficient manner; and
 - Provide assistance to developing countries in the management of hazardous waste and the generation.
- International Union for Conservation of Natural Resources Red List of Threatened Species

The IUCN Red List, in 1994, was founded in order to provide a comprehensive inventory of the global conservation status of biological species, and to set of precise criteria to evaluate the extinction risk of thousands of species and subspecies. These criteria are applicable to all species and all regions of the world.
- Convention on the Conservation of European Wildlife and Natural Habitats, 1979, ratified by Law no. 13/1993 (Bern Convention).

- Convention on Conservation of Migratory Species of Wild Animals, 1979, ratified by Law no. 13/1998 (Bonn Convention).
- United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters 1998, ratified by Law no. 86/2000 (Aarhus Convention);
- European Convention on the Protection of the Archaeological Heritage, 1992, ratified by Law no. 150/1997 (La Valetta Convention).
- European Landscape Convention, 2000, ratified by Law no. 451/2002 (Florence Convention).
- The International Labour Organisation's Core Conventions

As a member of the International Labour Organization (ILO), Romania has ratified over 100 ILO conventions, including the eight fundamental conventions listed below which are core requirements of IFC PS2.¹ These conventions are listed below:

- C029 - Forced Labour Convention, 1930 (No. 29).
- C087 - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87);
- C098 - Right to Organise and Collective Bargaining Convention, 1949 (No. 98).
- C100 - Equal Remuneration Convention, 1951 (No. 100).
- C105 - Abolition of Forced Labour Convention, 1957 (No. 105).
- C111 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111).
- C138 - Minimum Age Convention, 1973 (No. 138) Minimum age specified: 15 years; and
- C182 - Worst Forms of Child Labour Convention, 1999 (No. 182).

3.3 Lenders' standards

The Project is required to meet the requirements of international lending financing institutions, specifically IFC and EBRD.

- International Finance Corporation (IFC) Performance Standards (2012).
 - Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts.
 - Performance Standard 2: Labour and Working Conditions
 - Performance Standard 3: Resource Efficiency and Pollution Prevention.
 - Performance Standard 4: Community Health, Safety, and Security.
 - Performance Standard 5: Land Acquisition and Involuntary Resettlement
 - Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources.
- World Bank Group Environment, Health and Safety (ESHS) Guidelines (General and Industry Sector):
 - General ESHS Guidelines (April 2007) which cover four areas of GIIP: Environmental; Occupational health & safety (OHS); Community health & safety (CHS); Construction and decommissioning.

¹ Source: https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO::P11200_COUNTRY_ID:102576

- World Bank Group, Environmental, Health and Safety Guidelines for Wind Energy (2015)
- WBG ESHS Guidelines Electric Power Transmission and Distribution (April 2007).
- Equator Principles IV (2020)
- European Bank for Reconstruction and Development (EBRD) – Environmental and Social Policy (2024) including EBRD Environmental and Social Requirements (ESRs)

The Project will also refer to relevant Good International Industry Practice (GIIP) relevant to the O&M phase, including, but not limited to:

- Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (2007).

Noise standards

The following project standards apply to the operation of the Project.

Table 2 Noise limits from World Bank Group Noise Level Guidelines

Purpose of premises or territories	Time	WBG ESHS Guidelines
Territories adjacent to homes, clinics, dispensaries, rest homes, boarding houses, nursing homes, childcare facilities, schools and other educational institutions, and libraries.	From 7 am to 10 pm	55 dB(D)
	From 10 pm to 7 am	45 dB(A)
Industrial; Commercial	70	70
Maximum increase in background levels of 3 dB at the nearest receptor location off-site		

The Project-adopted standards will be based on the most stringent among applicable national requirements, IFC PSs and relevant WBG guidelines.

Shadow flicker standards

As per the WGB ESHS Guidelines, Wind Energy (2015), the predicted duration of shadow flicker effects experienced at a sensitive receptor must not exceed 30 hours per year and 30 minutes per day on the worst affected day, based on a worst-case scenario.

Lender Environmental and Social Action Plan

FLS and the O&M Contractors will adhere to the IFC Performance Standards (IFC PSs) as part of the financing agreement.

Outstanding compliance areas and actions for compliance during the O&M phase are defined in the Lender Environmental and Social Action Plan (ESAP) developed for Vifor 1 and Vifor 2, provided in Annex B. Specific requirements as set out in the Project ESAP are referred to in subsequent sections of this OESMP.

4 Institutional arrangements

FLS will oversee stakeholder engagement and communication requirements and implementation of the community grievance mechanism for the Project. Specific tasks may include:

- Working with the O&M Contractors to make necessary notifications to their staff and stakeholders as per the Project SEP;
- Ensure that ESHS, labour and security issues are adequately communicated to relevant stakeholders;
- Provide updates to the media on any activity;
- Coordinate the implementation of grievance mechanism, monitoring, and reporting (as defined in the Project SEP).

The implementation of the Grievance Mechanism in all Project Communities will build on the engagement conducted throughout the construction stage and address operation stage in line with the Stakeholder Engagement Action Plan developed for the operations phase.

5 Operational Environmental and Social Management System (O-ESMS)

5.1 Corporate plans and procedures

FLS will adopt the following Owner policies and procedures or develop Project Company policies and procedures to underpin project level O&M activities.

First Look Solutions has developed a set of overarching E&S company policies relating to environmental and social, labour, and local content, as listed below, and has committed to implement these on the Project to guide and ensure conformance to the Applicable Standards.

These are applicable to all activities, including the O&M works program and all staff working for the Project:

- Environmental & Social Policy.
- Health, Safety & Security Policy.
- Accommodation Management Policy.
- Local Content Policy.
- Workers Code of Conduct

In addition, there are Owner policies, as follows:

- Code of Conduct and Business Ethics.
- Anti-Bribery and Anti-Corruption Policy.
- Corporate Social Responsibility Policy.
- Employment Policy.
- Whistle Blower Policy.
- Environmental and Social Policy.
- Health and, Safety, and Security Policy.

These policies establish the framework for the Project's health and safety, environment, labour and social management processes as further developed and defined within this ESMP.

All Policies will be displayed in a prominent location in the Project offices and around the Site and circulated to all Contractors. E&S Policies are reviewed on an annual basis.

5.2 Project Company Operational E&S management system (OESMS)

The Project Company established an ESMS framework to oversee the O&M phase – see Figure 2 below.

The Project Company retains ultimate accountability for E&S performance and IFC PS compliance. Contractors implement Project requirements through Management Plans, Procedures and Work instructions. Where discrepancies arise, Project Company requirements prevail.

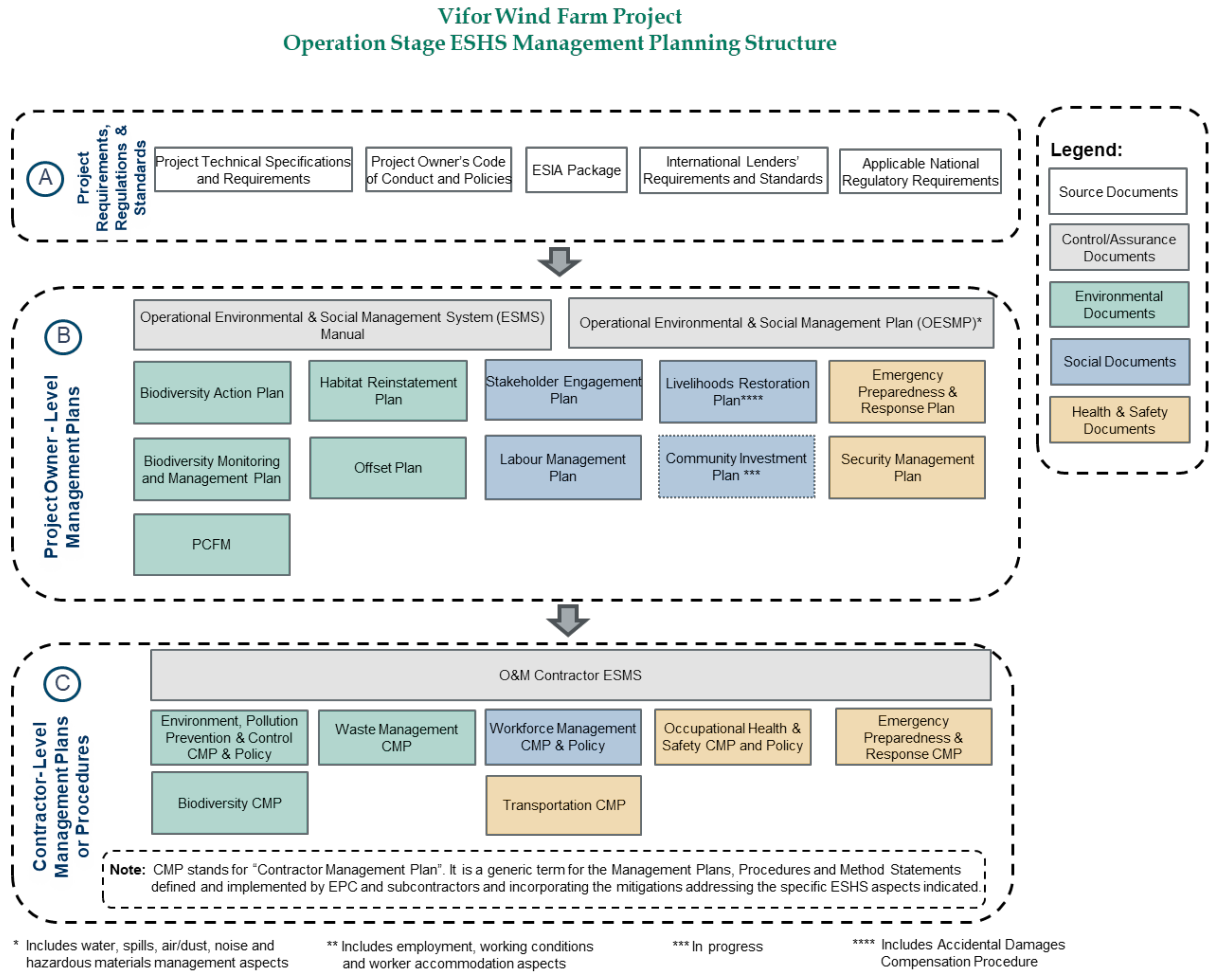
The Vifor Windfarm OESMS comprises:

- ESIA package
- Project policies
 - Project E&S Policy (refer to OESMS Manual, Annex A)
 - Project Health, Safety and Security Policy (refer to OESMS Manual, Annex B)
- Operational Environmental and Social Management System (OESMS) Manual
- Operational Environmental and Social Management Plan (OESMP) (this document)
- Biodiversity Monitoring and Management Plan (BMMP) including:
 - Biodiversity Action Plan (BAP)
 - Habitat Reinstatement Plan
 - Offset Plan
 - Post-Construction Fatality Monitoring (PCFM) Program
- Stakeholder Engagement Plan (SEP)
- Livelihood Restoration Plan (LRP)
- Emergency Preparedness and Response Plan (EPRP)
- Security Management Plan (SMP)
- Community Investment Plan (CIP).

The ESMS framework is aligned with Lenders' standards and international good practice.

To allow flexibility to the O&M Contractors in defining procedures in line with their own management system process, the mitigation measures addressing the specific E&S impacts may be defined in Management Plans, Procedures and Method Statements, generically referred to herein as the Contractor Management Plans (CMPs)), as deemed appropriate by the O&M Contractor. However, the O&M Contractor is to ensure that CMPs addressing the below-indicated specific topics are defined and implemented throughout the Project execution.

Figure 2 Vifor OESMS Structure



5.3 O&M Contractor requirements

5.3.1 General requirements

The O&M contractor is to develop and implement their own operations ESMS, inclusive, as relevant, of policy statements, management and monitoring measures and aspect-specific management plans or procedures applicable to the O&M activities they conduct. The structure and content of the O&M Contractors' OESMS will be fully aligned with the company's and with the adopted Project-specific standards.

The O&M Contractors are responsible for ESHS management, compliance, monitoring, mitigation, and restoration of areas affected by its activities, following the Project OESMP and supporting plans. The O&M Contractors are responsible for developing a suitable site Environmental and Social Management System (ESMS), Health and Safety Management System (HSMS), and/or all supporting site procedures and method statements to implement the requirements of this OESMP.

The O&M Contractors are responsible for ensuring all sub-contractors have site procedures or method statements to align with this OESMP or work under the lead O&M Contractor ESMS/HSMS.

The O&M Contractor will prepare documentation for any consents and permits and implement their scope of works following this OESMP.

5.3.2 ESHS Policies

The O&M Contractor will share their existing policies or develop the following Project policies in alignment with the FLS Policies as provided in the OESMS Manual:

- Health, Safety and Environmental Policy.
- HR/Labour Policy.

5.3.3 Management Plans & Procedures

The O&M Contractor will develop and implement an Environmental and Social Management System (ESMS) associated with the Project O&M activities, as relevant. This is to include:

- Contractor Operational Environmental and Social Management Plan (Contractor OESMP) or similar, outlining:
 - Institutional/organizational arrangements measures, including the procedure for continued consultation with and participation of affected people during project implementation (this may link to the communication plan), schedule and cost.
 - Actions to implement mitigation, including emergency preparedness, and the grievance redress mechanism.
 - Key monitoring and reporting requirements, including key performance indicators.
 - Roles and responsibilities of key personnel.
 - Training and competence.
 - Inspections, auditing, Monitoring and Reporting (including incident reporting).
 - Documentation control.

- The following topic specific CMPs are to be developed as standalone management plans or working procedures or combined into single document, as per the O&M Contractors' preference.
 - Labour Management (including Accommodation and Labour).
 - Environmental management (including among others, noise, waste, spill control, and hazardous materials management).
 - Occupation Health and Safety Management.
 - Emergency Preparedness and Response (EPR).

Over time, the Contractor OESMP must be supplemented by more detailed contractor management procedures or site method statements including high-risk and non-routine works. These documents shall be approved by the Project Company

The O&M Contractor will not undertake any work outside the prior agreed work areas without obtaining permission from the Project Company (i.e. the area covered by the permits/ ESIA) .

5.3.4 Subcontractors

O&M subcontractors are responsible for implementing specific activities under the O&M scope subcontracted by the O&M Contractor.

O&M sub-contractor responsibilities include:

- Review the OESMP and supporting Project Company and Contractor plans and/or procedures and integrate relevant requirements into their activities' Risk Assessment Method Statement (RAMS).
- Train workers on the relevant content of the OESMS.
- Coordinate with Project Company prior to works commencing in relation to any interface requirements with project affected people.
- Report any grievances raised directly with the O&M subcontractor to the Project Company.

5.3.5 Risk assessment

The O&M Contractor will develop an HSE risk assessments and prepare activity specific risk assessments before any service/maintenance work occurs on site (e.g., job hazard analysis, permit to work) with reference to the Project HSES Risk Assessment and Commitments Register as defined in section 2.5 of the OESMS Manual and owned by FLS. Specific risks shall be discussed prior to the start of any work activities at the Project Site by means of "setting to work briefings/toolbox talks". Risk meetings shall also be conducted any time that a work crew starts a new task which is different to the task that was previously assigned to the work crew, regardless of the time of day and/or night.

5.3.6 Management of change

The O&M Contractor will not undertake any work outside the prior agreed boundaries without first obtaining permission from the Project Company. If alternative work sites are required by the O&M Contractor, they must undertake an E&S review of the site and activities not already assessed in the EIA/supplementary documentation. The purpose of the review will be to demonstrate that the change

does not introduce previously unanticipated significant impacts. The O&M Contractor should include inter alia:

- Description of the baseline of the affected area (including updated social or biodiversity assessments if relevant).
- The proposed work activities and potential impacts (conduct updated assessments if required).
- Evaluation of significance of impacts (based on magnitude and receptor sensitivity).
- Confirm whether the impact can be managed using existing management plans and procedures.
- Develop new procedure if required; and
- Submit updated E&S review to Project Company for approval.

Where a significant impact is introduced that requires detailed assessment or cannot be mitigated using existing plans and procedures, it may be necessary to obtain a revised authorisation, and this should be obtained in partnership with the Project Company.

Table 3 provides a list of Project topics under this OESMP describing the minimum requirements around specific impacts identified in the Project ESIA report.

The O&M Contractor will review these requirements and prepare **O&M Contractor plans/procedures** that comply with or exceed the minimum requirement defined and describe how this will be done in supporting CMPs.

Table 3 Project-specific topics

Topic to be addressed	Requirements reference
ESMS General	Section 3.2
O&M Contractors, sub-contractors and suppliers' management	Section 3.3
Emergency Preparedness and Response (EPR)	Section 3.4
Health and Safety (OHS)	Section 3.5
Environmental Management (covering noise, dust, traffic, pollution, water, environmental monitoring)	Section 3.6
Biodiversity and Vegetation management	Section 3.7
Community health and safety management	Section 3.8
Waste (general and hazardous) management	Section 3.9
Labour management	Section 3.10
Security (site and community) management	Section 3.11

6 Roles and Responsibilities

6.1 Overview

Institutional arrangements for implementation are held with the bodies listed below and described in the following sections:

- Project Owner – Rezolv Energy: the main activities of the Project Sponsor are the development and operation of renewable energy projects in Europe.

- Project Company – FLS: it ensures operational compliance as per the IFC Performance Standards (IFC PSS) as defined Project Appraisal Document, Financing Agreement, Operations Manual and Government policies and permits, as applicable (see below for further explanation).
- O&M Contractors:
 - WTGs servicing– Vestas
 - Substation operations (from ToC) – Monsson, including dispatch agreement
 - Civil works for roads repairs outside of contracts and warranties – *to be appointed via a service agreement.*
 - Security contractor(s) – ensuring care, custody and control of all the work and all materials and equipment – *to be appointed.*
- Lenders: IFC, EBRD, commercial banks.

6.2 Project Company

The Project Company will include a team of specialised staff responsible for project and performance management, financial management, procurement, environmental management, social management, monitoring and evaluation and contract management, as well as support staff such as a secretary, legal support, fiduciary support staff.

The Project Company will recruit specialised contractors for specific technical assistance to implement activities.

The Project Company will liaise closely and ensure overall coordination of all Project entities to ensure necessary data and information are shared and collated for reporting to the Project Board and other stakeholders.

The key roles include:

- Site based:
 - Site Manager
 - Community Liaison Officer (CLO)
- Partial site presence:
 - Operations Manager
 - Grid Manager
 - ESG Manager (Regional)
 - HSEQ Manager (Regional)
 - Biodiversity Experts (third party)
 - Other third parties experts as required (incl. remote)

Figure 3 E&S Organization

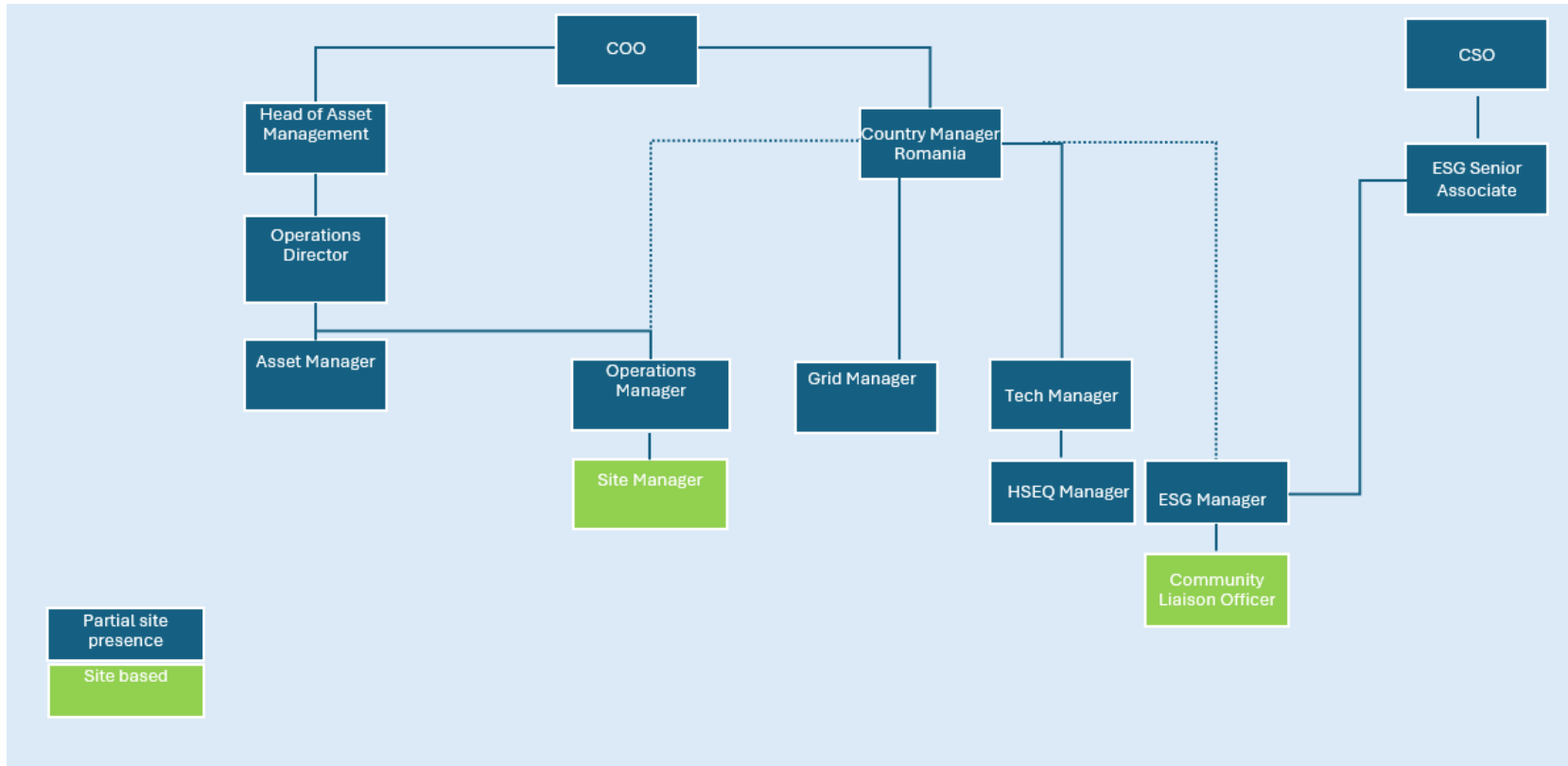


Table 4 Project Company Roles and Responsibilities

Role	Presence	Key Responsibilities
Senior Management (corporate)	<i>Remote</i>	<ul style="list-style-type: none"> • Overall accountability for Project delivery in line with national legislation and applicable international standards. • Ensure adequate financial, human, and technical resources for effective OESMP implementation. • Ultimate responsibility for addressing ESHS non-compliances, incidents, and corrective actions. • Periodic review of OESMP effectiveness and performance.
Site Management (Project)	<i>Site based</i>	<ul style="list-style-type: none"> • The Site Management Team will oversee and coordinate the operational activities on site. • The Site Management team will include the Operations Manager, Site Manager, OHS and Environmental Responsible as per the legal requirements and other operational roles
HSE Supervisor(s) (Project level – intermittent)	<i>Site-based (as required during O&M)</i>	<ul style="list-style-type: none"> • Conduct routine inspections of Contractor and subcontractor activities on site at least weekly. • Verify compliance with Project HSE requirements and method statements. • Deliver induction, toolbox talks and on-site HSE training. • Record, report and follow up on incidents and corrective actions. • Participate in internal and external audits. • Report regularly to the HSEQ Manager.
HSEQ Manager (Regional) (corporate)	<i>Partial site presence (corporate-based with site engagement)</i>	<ul style="list-style-type: none"> • Review, update and maintain the Project Company ESMS and support OHS procedures (at least monthly). • Review and approve Contractor OESMPs and site-specific OHS management plans prior to work. • Coordinate third-party OHS audits. • Ensure incident reporting, investigation and lessons learned. • Prepare and submit periodic OHS monitoring and compliance reports • Provide ESHS oversight of Contractors, including audits, training and corrective actions.
ESG Manager (Regional) (corporate)	<i>Partial site presence (corporate-based, with periodic site engagement)</i>	<ul style="list-style-type: none"> • Overall oversight of E&S obligations under the ESIA, ESAP, OESMP and supporting plans, on a monthly basis. • Act as focal point for ESHS matters with Lenders and regulators. • Coordinate third-party E&S audits as required by the Loan Agreement. • Ensure E&S incident reporting, investigation and lessons learned. • Prepare and submit periodic ESHS monitoring and compliance reports to Lenders as per loan agreement • Review, update and maintain the Project Company ESMS and supporting procedures. • Review and approve Contractor OESMPs and site-specific management plans prior to work.

Role	Presence	Key Responsibilities
		<ul style="list-style-type: none"> • Coordinate and oversee implementation of the Stakeholder Engagement Plan (SEP). • Manage and monitor implementation of the Project Grievance Mechanism. • Ensure timely, transparent communication with communities and stakeholders. • Oversee stakeholder mapping and monitor local developments affecting the Project. • Ensure documentation of engagement activities and grievance records. • Oversee external communications, information disclosure and media relations. • Lead development and implementation of the Project's community investment programme.
Community Liaison Officer(s) (Project level)	<i>Site-based (permanent works) during</i>	<ul style="list-style-type: none"> • Act as the primary interface between the Project and local communities. • Disseminate information on Project activities and schedules at local level. • Support implementation of the SEP and Grievance Mechanism at site level. • Assist community members in submitting grievances. • Identify emerging community concerns and report to the ESG Manager. • Support identification of community needs and implementation of community investment activities. <p>Attend monthly Project progress meetings (site)</p>
Biodiversity Specialist(s) (Project level)	<i>Third party subcontractor</i>	<ul style="list-style-type: none"> • Support implementation of the Biodiversity Action Plan. • Support biodiversity surveys, monitoring, and reporting. • Verify Contractor compliance with biodiversity mitigation measures. • Support operational ecological monitoring activities.

6.3 All employees

All Project employees, including the O&M Contractors, and subcontractors working on behalf of the O&M Contractors are individually and collectively responsible for:

- Their safety, as well as that of others and the impact their activities have on the environment and communities.
- Understanding and working within the guidelines and requirements established by Owner's ESMS Policies and its supporting management plans.
- Supporting the ESHS policies and management plans the O&M Contractor established in their work's day-to-day performance.

- Notifying their supervisors, including O&M HSE officers and Community Liaison Officer (as relevant), of any observed incidents, community issues, equipment malfunctions, unsafe or unhealthy situations, improper acts, etc.
- Sign Workers Code of Conduct (Annex F)

6.4 O&M Contractors

The O&M Contractor is responsible for implementing all OESMP requirements applicable to their activities. This can include preparation of a Contractor-specific OESMP, obtaining and maintaining permits, ensuring workforce competence, and managing subcontractors in accordance with Project and Lender requirements.

The O&M Contractor is responsible for identifying personnel and other resources responsible for managing HSE implementation, monitoring and reporting.

The Project Company reserves the right to reject any personnel with HSE responsibilities hired by the O&M Contractor (or their sub-contractor) based on qualifications.

The O&M Contractor shall provide qualifications of all HSE responsible personnel upon request. As part of the OESMP, the O&M Contractor shall consider the environment, labour policy and OHS records when choosing Subcontractors and Suppliers.

Table 5 O&M Contractors' Roles and Responsibilities

Role	Presence	Key Responsibilities
O&M Contractor Project Manager / Supervisor	<i>Site presence</i>	<ul style="list-style-type: none"> • Overall responsibility for implementation of the Contractor OESMP. • Day-to-day oversight of HSE performance on site. • Ensure adequate resources, equipment, and personnel for safe operations. • Integrate ESHS considerations into daily operational management. • Participate in OESMP reviews and updates. • Ensure timely communication of ESHS incidents to the Project Company. • Conduct inspections and monitor compliance with method statements and permits. • Deliver toolbox talks and HSE briefings. • Record and report incidents, near misses and corrective actions. • Support audits and inspections by the Project Company.
O&M Environmental & Social Manager	<i>Remote</i>	<ul style="list-style-type: none"> • Advise workers and subcontractors on Project-specific E&S requirements. • Review and update operations-phase E&S plans and procedures. • Identify improvement opportunities and incident prevention measures. • Support ESHS reporting in accordance with Project Company requirements. • Liaise with Project Company ESHS Manager on E&S matters.
O&M Health & Safety Manager	<i>Remote</i>	<ul style="list-style-type: none"> • Provide strategic oversight of H&S performance across sites. • Ensure compliance with applicable H&S legislation and Project

Role	Presence	Key Responsibilities
All O&M Employees and Subcontractors	<i>Site-based / applicable</i>	<p>standards.</p> <ul style="list-style-type: none"> • Support investigations of incidents and definition of corrective actions. • Promote a continuous improvement culture in H&S management. • Liaise regularly with Project Company ESHS representatives. <ul style="list-style-type: none"> • Comply with OESMP requirements and site rules. • Take reasonable care of own and others' health and safety. • Report hazards, incidents, and ESHS concerns. • Comply with Worker Code of Conduct and benefit from a worker grievance mechanism.

7 Management of Impacts and Mitigation Requirements

7.1 Summary of project impacts

A summary of operational impacts for all O&M aspects as per the Vifor ESIA is provided in Table 6 and forms the basis for the management and mitigation requirements elaborated in Owner and Contractor plans.

Table 6 Summary of operational impacts as per the ESIA

Topic	Potential Impact	Significance (Pre-mitigation)	Residual Significance (Post-mitigation)	Notes
Noise	Operational noise at nearby noise sensitive receptors	Minor	Negligible	Refer to Table 11
Shadow Flicker	Shadow Flicker at nearby receptors over the WBG thresholds	Moderate	Minor	
Soil and Groundwater	Accidental leaks/spills of fuel, oil, chemicals and hazardous materials from O&M activities that might contaminate soil. Poor hazardous waste storage	Minor	Negligible	Refer to Table 11
Solid waste management	Soil contamination, uncontrolled storage of waste	Minor	Negligible	Refer to Table 16
Wastewater	Uncontrolled releases/ leaks and erosion	Minor	Negligible	Refer to Table 11
Biodiversity	Species distribution and abundance collision risk	Major	Negligible	Refer to Table 12
	Habitat degradation	Negligible	Negligible	
	Invasive Alien Species	Moderate	Negligible	
	Spermophilus citellus - Habitat Degradation / Fragmentation, Noise and Vibration, Electrocutation Risk	Moderate	Negligible	
	Lutra lutra - Habitat Degradation / Fragmentation, Disturbance and Stress	Moderate	Negligible	
	Species Collision with Wind Turbines	Moderate	Negligible	
	Displacement	Moderate	Negligible	
	Mortality through electrocution on OHTL	Moderate	Negligible	
	Direct mortality of Fauna species	Major	Negligible	
	Species collision with wind turbines	Moderate	Minor	
Social impacts	Community health and safety	Negligible	Negligible	Refer to Table 13
	National and regional economy	Moderate positive	Major positive	Refer to Table 13
Occupational health and safety	Electromagnetic fields, Potential for electrocution, Lightning strike and fire, Potential issues associated unauthorised access and vandalism	Minor	Minor	Refer to Table 9
Labour impacts	Employment (direct and indirect)	Minor positive	Minor positive	Refer to Table 18

7.2 ESMS General

The general requirements of the ESMS are covering the key mitigation measures required to ensure compliance with the Applicable standards – see below.

Table 7 ESMS General requirements

	Issue	Mitigation measures	Responsibility / Implementation Agency	Timeframe/ deadline	Monitoring / Compliance indicator/verification
1	Compliance with national requirements	<ul style="list-style-type: none"> Obtain operational environmental approval before the start of operation 	Project Company	Pre-operation	Operations Permit
2	Implement ESMS in line with Applicable Standards	<ul style="list-style-type: none"> Ensure ESMS includes relevant requirements for E&S and H&S-related training, communication, monitoring, reporting, accident incident reporting, auditing, management review, and continuous improvement. 	Project Company	Pre-operation	Annual reporting Periodic compliance audit
3	Operational management planning	<ul style="list-style-type: none"> Develop Project O-ESMP. Ensure the community grievance mechanism is disclosed in project communes. Maintain regular stakeholder engagement, at least annually. All maintenance work to have a specific risk assessment addressing waste, climate risks H&S, hazardous material management, emergency preparedness and response, and traffic risks) Always ensure correct PPE 	Project Company O&M Contractor	Annually	Project O-ESMP Annual reporting GM Log SE Log Risk Assessments (maintenance works) Waste documentation

7.3 Contractor management

7.3.1 Project company

The Project Company will require that all contractors engaged in the Project operate in a manner consistent with the requirements of this OESMP.

The Project Company will effectively manage all contractors as follows:

1. Assessing the ESHS risks and impacts associated with such contracts.
2. Ascertaining that contractors engaged in the project are legitimate and reliable enterprises with the knowledge and skills to perform their project tasks according to their contractual commitments.
3. Incorporating all relevant aspects of the ESMP into supplier contracts.
4. Contractually requiring contractors and suppliers to apply the relevant aspects of the ESMP and management tools, including appropriate and effective non-compliance remedies.
5. Monitoring contractor compliance with their contractual commitments; and
6. In the case of subcontracting, contractors must have equivalent arrangements with their subcontractors.

Project E&S schedule

The Project Company will develop Project E&S schedule that is the same or equivalent to the E&S schedule in the contract between the Project Company and the O&M Contractor for use when contracting with all third-party Tier 2 Subcontractors and suppliers. The E&S schedule will set out Project requirements against the following subheadings with explicit reference to the requirement of the IFC PSs and relevant GIIP.

The topics to be elaborated in the E&S schedule are:

- General ESHS management.
- ESHS staffing.
- Requirements for assessing E&S risks.
- ESHS training.
- Hazardous materials, waste management, biodiversity management, occupational health and safety.
- Emergency response, security.
- Labour welfare aligned with IFC PS2.
- ESHS inspections and auditing.
- ESHS reporting, including labour reporting (inc. Incident reporting, community relations, local hiring, code of conduct).
- Environmental, health, and safety non-conformities and penalties.
- Documentation and compliance records.

7.3.2 O&M Contractor

The O&M Contractor will develop within the OESMS a procedure to address Subcontractor and Suppliers management setting out how it will engage and audit their third-party sub-contractors and

suppliers prior to contracting to verify their eligibility to meet the E&S obligations as set out in this document.

This shall include:

- Willingness to adhere to environmental, social, health and safety and labour policies of this OESMP.
- Documentation to evidence practices that align with IFC PR2, including their entitlement to wages and benefits, hours of work, overtime arrangements and overtime compensation, and leave for illness, maternity, vacation or holiday, that at a minimum comply with national law. This includes respecting a collective bargaining agreement with a workers' organisation if there is such an agreement to working conditions, terms of employment (worker contracts).
- Confirm no major ESHS incidents or fatalities in the last five years; and
- Commitment to provide appropriate personal protective equipment (PPE) in conjunction with training, use and maintenance of the PPE. PPE provides additional protection to workers exposed to workplace hazards in conjunction with other facility controls and safety systems and the ability to implement OHS procedures in line with this OESMP.

7.4 Emergency Preparedness and Response

The emergency preparedness and response system is prepared to respond to accidental and emergencies associated with the project in a manner appropriate to prevent and mitigate any harm to people and/or the environment.

This preparation will include:

- identifying areas where accidents and emergencies may occur
- communities and individuals that may be impacted, response procedures
- provision of equipment and resources, designation of responsibilities
- communication, including that with potentially Affected Communities
- periodic training to ensure effective response.

The emergency preparedness and response activities will be periodically reviewed and revised, as necessary, to reflect changing conditions.

The following potential emergency scenarios relating to the O&M works have been identified:

- Severe weather events (wind, rain).
- Medical emergency (e.g., an accident resulting from material handling, rigging, hoisting, excavations, failure of temporary structures, chemical or hazardous material contact).
- Fall from height or injury at height.
- Worker evacuation (e.g., from height, confined space).
- Explosion/fire emergency plan (bushfire).
- Hazardous material or spill release plan (e.g., from on-site materials, chemicals and solutions).
- Electrical accident (e.g., working with live equipment for the O&M of the turbines or substation).
- Security incident.
- Transportation incident.
- Criminal activity (terrorism, robbery, hostage incident, bomb threat, suspicious package, workplace violence); and
- Demonstration / civil disturbance.

Both Project Company and O&M contractors will review the completeness of this list and identify additional scenarios, as relevant.

7.4.1 Project Company responsibilities

The Project Company will have the following general responsibilities:

- To develop an Emergency Preparedness Response Plan (EPRP) compliant with the IFC PS1,
- The overall implementation of this sub-plan.
- To assure agencies are notified of incidents.
- To confirm Contractor resources are available for handling the emergency; and
- To audit the EPRP and Contractor emergency drills to test effectiveness of the Contractor EPRP CMP.

Where applicable, the Project Company will assist and collaborate with the potentially Affected Communities and the local government agencies in their preparations to respond effectively to emergencies, especially when their participation and collaboration are necessary to ensure an effective response.

The Project Company's community liaison officer (CLO) will work with the Contractor to identify and disseminate information on potential emergency scenarios that may affect local communities. Specifically, the CLO will liaise with the local community on the following topics:

- Potential emergency scenarios that may impact on the local community (e.g. traffic movements, blasting activities);
- Emergency contact information in the event of an emergency situation; and
- Local capacity for providing emergency response resources (firefighting, medical, paramedic etc.).

7.4.2 O&M Contractor responsibilities

The Contractors' ESMS is expected to be proportionate to the O&M Contractor's scope of work and to focus on implementation of Project Company requirements, rather than development of standalone management plans. With regards to emergency management:

- The Project Company retains overall accountability for emergency preparedness and community health and safety as per the Emergency Preparedness and Response Plan (EPRP).
- The O&M Contractor implements this EPRP through site procedures, work instructions, and training (CMP).
- No standalone emergency management plans are required at contractor level beyond the Project Company's EPRP and task-specific procedures.

The O&M Contractor must set up an EPRP CMP for managing risks connected with the VWF and documented in the O&M EPRP developed by the Project Company. This is to include:

- Risk management protocols for climate-related risks, exposure to contamination risks, OHS and traffic risks) during maintenance works (may be for portfolio not Project-specific)
- Defined Roles and responsibilities within an EPRP for a VWF Emergency Response Team (ERT).
- Outline of emergency resources maintained at adequate levels for the O&M phase of the project.
- Procedures for coordination of all employees and activities during an incident.
- Medical evacuation procedure to enable injured workers to access appropriate emergency facilities during maintenance works (may be for portfolio not Project-specific).

- Overview of medical preparedness includes the following within work team vehicles and team: first aid facilities and first aiders during maintenance works (all maintenance teams including O&M subcontractor teams).
- Outline for testing the EPR using mock drills and (joint) exercises.
- Training requirements for employees on EPRP requirements.
- Communication requirements with relevant emergency response agencies to assess their capacity to define EPRP requirements.
- Provide adequate worker and shelter provisions at each work front during maintenance works.

7.5 Occupational Health and safety (OHS)

7.5.1 Project Company responsibilities

The Project Company will have the following general responsibilities:

- Ensure that all contractors adhere to the OHS Project policies, local regulations and OESMP and supporting plans.
- Appoint an HSEQ Manager to oversee OHS implementation on behalf of Project Company.
- Oversee the activities of the O&M Contractors for OHS management and emergency preparedness.
- Review O&M Contractor reporting regularly.
- Monitor implementation of contractor ESMS and advise O&M Contractor(s) to drive the implementation of national and Lender standards and procedures at the site.
- Review and approve contractor procedures and method statements before work commences, including correct certifications relevant to the work activity planned.
- Collate, report and submit all ESHS monthly compliance audits, monthly incident statistic reports and monthly lender reporting, any other required documented records and report findings;
- Conduct H&S inspections and audits and ensure corrective actions are monitored and documented as required by this OESMP (including worker audits).
- Confirm that all site personnel and employees are informed of site safe working procedures and practices so that they can fulfil their responsibilities.
- Oversee implementation of the O&M Contractor H&S plan, training records, matrix, and HR policies.
- Verify contractor provisions for medical preparedness and facilities are readily available for all employees and that records are adequately maintained and the adequacy of contractor Emergency Preparedness, ensuring appropriate training mock drills and ensure contingency plans are current.
- Oversee O&M Contractor investigation of incidents or near-miss events as necessary or required, including compilation and completion of any necessary documentation (e.g., Accident investigation or Near miss forms).
- Provide out-of-hours emergency contact service.
- Ensure efficient HSE communication via HSE committee meetings, attendance and sharing information from HSE meetings.

Table 8 Project Company Responsibilities – OHS

Activity	Project Commitment	Responsibility	Timing	Monitoring measures
Occupational health and safety	<ul style="list-style-type: none"> Ensure a comprehensive Health and Safety Management System (HSMS) is established on site by the Contractor Implement Management measures for occupational noise, falls from height, electrocution risks etc. Develop an emergency preparedness and response plan (EPRP) Define workplace protocols for service / maintenance activities. Conduct Project specific HSE risk assessment identifying physical, biological, and other hazards and prioritise hazards to employ/assign HSEQ Manager to oversee E&S obligations for the Site (may be based elsewhere). Ensure mandatory PPE, including steel-toe capped boots, overalls, hard hat, hi-vis vest, safety glasses, ear protection, gloves, and dust masks for specific tasks (e.g., welding) if prolonged welding are used by all workers on site Hold periodic safety briefings to ensure greater attention to detail and safety, especially when performing work activities in dangerous environments, i.e., working at heights during WTG maintenance. 	Project Company (HSEQ Manager)	Operations Prior to operations beginning on site and ongoing.	<ul style="list-style-type: none"> EPRP for Operations Monthly HSE reports: Numbers of fatalities, accidents, injuries, incidents, near misses Operations auditing, inspection and reporting schedule. Reviews of incident and accident reporting, drill reporting and any corrective actions identified, where relevant.
General site management	<ul style="list-style-type: none"> Ensure dedicated site roads shall be earmarked for the movement of vehicles around the site. 	Project Company (HSEQ Manager)	Prior to operations commencing on site.	<ul style="list-style-type: none"> Site map Site access procedure
Site Access	<ul style="list-style-type: none"> Ensure a procedure for site access authorisation for visitors and workers and for deliveries is established by the Contractor. The Project Company is to develop the Site regulations governing conduct, behavior and minimum safety requirements for all persons officially accessing the Site. 	Project Company (HSEQ Manager)	Prior to operations commencing on site.	<ul style="list-style-type: none"> Site access procedure
Induction training	<ul style="list-style-type: none"> Ensure a mandatory comprehensive site safety induction training, complemented as appropriate by specialised training. 	Project Company	Prior to operations	<ul style="list-style-type: none"> Site induction Training Matrix

Activity	Project Commitment	Responsibility	Timing	Monitoring measures
	<ul style="list-style-type: none"> ○ The safety induction will be updated to reflect changing nature of work on site on a regular basis; and ○ A simplified induction is allowable for visitors or site staff who will not enter the working area or who will be always accompanied. ○ The language of all training must reflect the workers on site. 	(HSEQ Manager)	commencing on site.	
Personal protective equipment (PPE)	<ul style="list-style-type: none"> • Ensure areas where wearing standard PPE is mandatory will be clearly indicated during induction and daily briefings. • Ensure minimum mandatory PPE equipment must include safety shoes, hi-vis vest, hard hat, but may differ as per the activity RAMS. 	Project Company (HSEQ Manager)	Prior to operations commencing on site.	Site access procedure Induction Site inspections
Safety signage	<ul style="list-style-type: none"> • Ensure a system of safety signage will be employed and communicated to all workers by the Contractor. 	Project Company (HSEQ Manager)	Prior to operations commencing on site.	Signage on site
Machinery and tools	<ul style="list-style-type: none"> • Ensure all machinery, tools, auxiliary accessories, equipment, and devices to be used on site shall have manuals, technical standards and specifications available to workers use equipment. • Ensure all machines and tools can only be used by authorized workers, on basis of their training and/or experience. 	Project Company (HSEQ Manager)	Prior to operations commencing on site	Machinery Matrix Training Matrix
Coordinating VWF activities	<ul style="list-style-type: none"> • Ensure the O&M Constructor has procedures for coordinating activities of all sub-contractors on site. 	Project Company (HSEQ Manager)	Prior to operations commencing on site.	Monthly and ad-hoc HSE Meetings

7.5.2 O&M Contractor responsibilities

The O&M Contractor will be responsible for the following:

- Develop and present its own **Occupational Health and Safety Management (OHS) Plan or Procedure**, which shall meet the minimum requirements of this OESMP.

The OHS Plan/ Procedure will include:

- Project safety principles and philosophy
 - H&S policies and commitments
 - Project H&S objectives
 - Project H&S challenges
 - Project H&S management system structure
 - H&S leadership, organization, competence, communication, roles and responsibilities
 - H&S contractors management
 - PPE requirements and enforcement
 - Incident reporting, investigation, and monitoring of non-conformances
 - Risk profiling and emergency preparedness and response planning
 - H&S Induction and training
 - H&S audit & review
 - H&S performance monitoring / improvement
 - Management of change
- Appoint appropriate sub-contractors considering their safety culture;
 - Before the commencement of O&M works at any job site, submit to the Project Company a job hazard analysis (JHA) / risk assessment (including H&S requirements) that includes consideration of all workers (including sub-contractors); this will include the scope of work, known and potential hazards, and corrective measures and controls that shall be implemented to abate these hazards;
 - Provide enough resources for implementation of health and safety controls measures (H&S equipment, personal protective equipment (PPE)).
 - Ensure effective communication of safety information to the relevant personnel (including supplementary training where required).
 - Provide enough first aid and emergency rescue resources on-site; and
 - Define own emergency evacuation procedure, hospital arrangements, and distance/time to reach the nearest advanced life support facility in line with the Project EPRP.
 - Specific operating procedures (e.g. electrical switching, working at heights, chemical product handling, working in confined spaces, hot work, working with scaffolding, working with cranes and load lifting, hand and power tools, working with machinery, electrical safety, noise prevention, material transport (unloading and storage), electrical installation. Permit to work system / lock out tag out system (LOTO).

Further requirements for occupational health and safety management to be included in the O&M Contractors Health and Safety Management Plan are defined in Table 9.

Table 9 O&M Contractors responsibilities - OHS

Activity	Project Commitment	Responsibility	Timing	Monitoring measure
Occupational health and safety	<ul style="list-style-type: none"> Develop an emergency preparedness procedure in alignment with the Projects' emergency preparedness and response plan (EPRP) Define workplace protocols for service / maintenance activities. Conduct Project specific HSE risk assessment identifying physical, biological, and other hazards and prioritise hazards to employ/assign ESHS officer to oversee E&S obligations for the Site (may be based elsewhere). Mandatory PPE, including steel-toe capped boots, overalls, hard hat, hi-vis vest, safety glasses, hard hat and ear protection, gloves, and dust masks for specific tasks (e.g., welding). All site workers must receive appropriate training before the commencement of work and on an ongoing basis through toolbox talks oriented by training plans. Adopt an accident and incident reporting procedure. Ensure all workers sign the VWF Worker Code of Conduct (Annex F) . Perform emergency "mock drills" (based on scenarios in the ERPP). Ensure first aid facilities at the CPCS. Establish an accident and incident reporting procedure. Develop a Worker Induction Program. Ensure all workers sign the VWF Worker Code of Conduct. Conduct OHS inspection and audits and ensure appropriate corrective action in a timely manner 	O&M Contractor (HSE Manager)	Operations - Prior to operations beginning on site and ongoing.	<p>EPR procedure</p> <p>Monthly HSE reports</p> <p>Operations auditing, inspection and reporting schedule.</p> <p>Reviews of incident and accident reporting, drill reporting and any corrective actions identified, where relevant.</p> <p>Inspections of signed Worker CoC.</p>
Site Access.	<ul style="list-style-type: none"> O&M Contractor shall adopt a procedure for site access authorisation for visitors and workers and for deliveries. O&M Contractor will follow the Project Company's safety requirements, which include: <ul style="list-style-type: none"> (a) following written procedures and requirements for opening, closing and locking gates on and around the Site; 	O&M Contractor (Site Manager)	Prior to operations commencing on site.	Approved Contractor Site access procedure

Activity	Project Commitment	Responsibility	Timing	Monitoring measure
	<ul style="list-style-type: none"> o (b) observing safe speed limits while driving on and around the Site and yielding the right of way to livestock and wildlife on the Site; o (c) a prohibition on carrying firearms on and around the Site; o (d) refraining from using the Site for any purpose other than the performance of the O&M activities. 			
Induction training and competence assessment.	<ul style="list-style-type: none"> • O&M Contractor shall ensure all workers attend the mandatory comprehensive site safety induction training provided by the Project Company • Additional specialised induction is to delivered, as defined in topic specific sections below, including <i>inter alia</i>: a GBVH induction, labour induction. 	O&M Contractor (HSE Manager)	Prior to operations commencing on site.	Approved Contractor Site induction
Personal protective equipment (PPE).	<ul style="list-style-type: none"> • Minimum mandatory PPE equipment must include safety shoes, hi-vis vest, hard hat, and safety glasses. • Colour-coded hard hats should be employed to identify key personnel (e.g., first aid workers); and • In addition to standard PPE, workers should wear safety equipment as defined in the job hazard analysis performed prior to start of work. 	O&M Contractor (HSE Manager)	Prior to operations commencing on site.	Approved Contractor PPE procedure
Safety signage.	<ul style="list-style-type: none"> • A system of safety signage will be employed at each work front and communicated to all workers; and • Areas of work activity e.g., lifting must be marked off and appropriately signed. 	O&M Contractor (HSE Manager)	Prior to operations commencing on site.	Signage on site
First aid.	<ul style="list-style-type: none"> • At least first aider at 1: 50 ratio per shift; AND • At each separate work front there shall be at least one person trained in lifesaving / first aid who could attend to primary care of an accident victim. • The work front will be equipped with a first aid kit. • All workers are required to notify line managers of any allergens; and • The first aid kit shall undergo a monthly revision, and products shall be replaced as soon as they have been used. 	O&M Contractor (HSE Manager)	Prior to operations commencing on site.	Approved Contractor first aid procedure / medical procedure Inspection of first response preparedness (e.g. First aid kits,)
Permits to work.	<ul style="list-style-type: none"> • Work permits shall be defined in the HSMS. A specific procedure shall be developed for working with live equipment. 	O&M Contractor (HSE Manager)	Prior to operations commencing on site.	Work permit procedure in HSP

Activity	Project Commitment	Responsibility	Timing	Monitoring measure
Machinery and tools.	<ul style="list-style-type: none"> All machines, tools, auxiliary accessories, equipment, and devices to be used on site shall have manuals, technical standards and specifications available to workers use equipment; A copy of this technical information, comprising operation, use, maintenance and upkeep instructions and procedures, shall be kept by the O&M Contractor; and Machines and tools can only be used by authorized workers, on basis of their training and/or experience. 	O&M Contractor (HSE Manager)	Prior to operations commencing on site	Approved Contractor Tools Procedure
Electrical hazards.	<ul style="list-style-type: none"> Whenever identified, overhead power lines that could affect the safety of the works shall be subject to barriers and warnings in accordance with standard safety requirements. 	O&M Contractor (HSE Manager)	Prior to operations commencing on site	Approved Method statements for any works on site requiring transit under or modification of OHTL
Material handling.	<ul style="list-style-type: none"> Prior to handling any chemical product, the operator must always consult the manufacturer's Safety Data Sheet and adhere to all the instructions therein. Sufficient flat ground will be available for storing materials to be used; and Materials, tools, hoisting equipment etc., shall be stored and protected from the effects of inclement weather. 	O&M Contractor (HSE Manager)	Prior to operations commencing on site.	Approved Contractor Manual Handling Procedure
Lone working.	<ul style="list-style-type: none"> O&M Contractor shall ensure the practice of employees working at remote locations on their own is permitted, subject to the specific safety mitigation provisions, which shall be defined in the O&M Contractors Health and Safety CMP 	O&M Contractor (HSE Manager)	Prior to operations commencing on site.	Approved Contractor Lone working Procedure
Worker welfare.	<ul style="list-style-type: none"> O&M Contractor provides drinking water for its staff in sufficient quantity, and in hygienic conditions. O&M Contractor will supply sufficient drinking water in proportion to the number of workers. It is prohibited to provide water for drinking through barrels, containers, buckets or other open containers; 	O&M Contractor (HSE Manager)	Prior to operations commencing on site.	Owner HSE inspections (covering this topic)
Coordinating VWF activities.	<ul style="list-style-type: none"> O&M Contractor will put in place procedure for coordinating activities of all sub-contractors on site. 	O&M Contractor (HSE Manager)	Prior to operations commencing on site.	Approved Contractor

Activity	Project Commitment	Responsibility	Timing	Monitoring measure
				Management Coordination Procedure

7.6 Environmental Management

7.6.1 Project Company Responsibilities

Table 10 Project Company Responsibilities – Environmental Management

Activity	Project Commitment	Responsibility	Timing	Monitoring measures
Environmental management and oversight	<ul style="list-style-type: none"> Develop, approve, and oversee environmental management plans to ensure compliance with regulatory and contractual requirements. 	Project Company (ESG Manager)	Prior to and during site operations	Frequency of oversight meetings
Environmental monitoring	<ul style="list-style-type: none"> Implement and maintain an environmental monitoring system to track compliance and identify areas for improvement. In case of community feedback or grievances, specific environmental monitoring (noise, shadow flicker, etc) will be conducted to confirm compliance to national and WBG thresholds. 	Project Company (ESG Manager)	During site operations	Monitoring reports submitted Compliance rates
Audits and inspections	<ul style="list-style-type: none"> Conduct monthly audits and site inspections to ensure adherence to OESMP and supporting plans. 	Project Company (ESG Manager)	Quarterly and as required	Number of audit findings Number of corrective actions closed
Environmental recordkeeping and reporting	<ul style="list-style-type: none"> Maintain daily, weekly and monthly records of environmental performance, incidents, and corrective actions (as provided by the Contractor); Report to relevant authorities, as per the Environmental Permit. 	Project Company (ESG Manager)	During site operations	Records completeness Timeliness of E&S reports Timeliness of regulatory reports
Community Grievance Mechanism	<ul style="list-style-type: none"> Establish and publicise a transparent mechanism for the community to raise environmental concerns and grievances. 	Project Company (ESG Manager supported by the CLO)	Prior to and during site operations	Number of grievances received Number of grievances resolved Response time
Continuous Improvement Initiatives	<ul style="list-style-type: none"> Promote ongoing improvement in environmental performance and compliance. 	Project Company (ESG Manager)	Prior to and during site operations	Number of improvement initiatives
Hazardous material management	<ul style="list-style-type: none"> Ensure a secure storage unit appropriate to hazardous substances, including the appropriate ventilation, labelling, segregation, bunding, emergency response equipment, and PPE. All material safety data sheets will be retained on-site and, where appropriate, risk assessments are performed. Checking of material in the hazardous material store will be coordinated and controlled by a nominated person trained in handling and safety requirements of hazardous materials. 	Project Company (ESG Manager)	Prior to and during site operations	Inspection / Audit reports Hazardous Materials Log MSDS (for all materials)

Activity	Project Commitment	Responsibility	Timing	Monitoring measures
	<ul style="list-style-type: none"> Correct PPE must be provided for all workers working with hazardous materials. All hazardous materials must be adequately disposed of, via authorized waste collection companies. 			Hazardous materials storage plan/ procedure

7.6.2 O&M Contractor Responsibilities

The O&M Contractor shall incorporate environmental management into its project plans and supporting procedures to ensure compliance with the requirements specified in Table 11.

Table 11 O&M Contractor Responsibilities – environmental management

Activity	Project commitment	Responsibility	Timing	Monitoring measures
Hazardous material management	<ul style="list-style-type: none"> Hazardous materials that must be stored on-site including at the work front must be in a secure storage unit appropriate to the material, with the appropriate ventilation, labelling, segregation, bunding, emergency response equipment, and PPE. All material safety data sheets will be retained on-site and, where appropriate, risk assessments performed. Checking of material in the hazardous material store will be coordinated and controlled by a nominated person trained in handling and safety requirements of hazardous materials. Correct PPE must be provided for all workers working with hazardous materials. All hazardous materials must be removed from the site at the end of the works. 	O&M Contractor (HSE Manager)	Operations	Hazardous Materials Log MSDS (for all materials) Hazardous materials storage plan/ procedure
Noise – maintenance activities	Implement GIIP for noise control: <ul style="list-style-type: none"> Use the quietest work methods and plant items where practicable. Equipment must be properly maintained and fitted with appropriate noise control. Avoid unnecessary revving of engines. Switch all equipment off when not in use (engines must not idle). 	O&M Contractor/ subcontractors (HSE Manager)	Operations – ongoing	Site inspections Vehicle maintenance logs Noise-related complaints (grievance log)

Activity	Project commitment	Responsibility	Timing	Monitoring measures
	<ul style="list-style-type: none"> Locate static equipment (e.g., generators) to take advantage of any screening to break the line of sight from receptors. Brief site operatives to keep noise to a minimum. Restrict general hours of working to avoid sensitive periods (e.g., night-time & evenings between 7 pm and 7 am) if there are sensitive receptors; Ensure engine covers of generators, air compressors and other powered mechanical equipment shall be closed, and equipment placed as far away from residential areas as possible; <p>Monitor noise grievances through the Project grievance mechanism</p>			
<p>Soil contamination</p>	<ul style="list-style-type: none"> Contractor procedures to be developed which will include provision for good working practices concerning the maintenance of vehicles and machinery, use, storage and handling of chemicals and management of wastes. Spill containment and clean-up kits will be available on-site (in maintenance vehicles and warehouse) and clean-up from any spill shall be appropriately contained and disposed of at a bound landfill site. Develop a site-specific Emergency Response Procedures for any soil clean-up and decontamination. General operational management requirements concerning good housekeeping during maintenance works and waste management and spill management provisions must be implemented. Maintenance works are restricted to specially designated platforms with strict control of accidental spills, Procedures for responding to emergencies / accidental spills of hazardous materials, fuel and handling, and waste management are developed and implemented, 	<p>O&M Contractor (HSE Manager)</p>	<p>Operations ongoing</p>	<p>–</p> <p>Monthly O&M reports</p> <p>Incident reporting</p> <p>Spill Kits</p> <p>Emergency Response Procedures</p> <p>Vehicle maintenance records</p> <p>Equipment maintenance records</p>

Activity	Project commitment	Responsibility	Timing	Monitoring measures
	<ul style="list-style-type: none"> In case of accidental/unintended spillage, the contaminated soil should be immediately collected and stored as hazardous waste. Removal of oil and other spills during operation and maintenance will be carried out using absorbent materials that will then be stored in designated areas for collection and disposal by authorised companies General good practice to avoid adverse impacts from vehicle and machinery use will be adopted, including: <ul style="list-style-type: none"> Equipment and vehicles will be periodically checked to avoid leaks due to defects. Avoidance of refuelling on site to prevent oil spills. If this is not possible, procedures will be developed to avoid accidental spillage 			

7.7 Biodiversity and Vegetation management

7.7.1 Project Company responsibilities

The Project Company prepared a Biodiversity Monitoring and Management Plan (BMMP) for the Operations phase, supported by a Biodiversity Action Plan (BAP) and a Post Construction Fatality Monitoring (PCFM) programme for birds and bats and maintains the overall responsibility for biodiversity related impacts and mitigations.

Additional protocols and action plans can be developed as the operational phase is deployed, as appropriate. See Table 12 below for an outline of key biodiversity project commitments.

Table 12: Project Company responsibilities - Biodiversity and Vegetation Management

Biodiversity impact	Commitment	Responsibility	Timeframe/ deadline	Monitoring measures
Reduced habitat connectivity Vehicle collisions with Fauna Collisions with WTG Barrier to species movement	<ul style="list-style-type: none"> Post construction fatality monitoring. Three-year aftercare and monitoring program ensures soil and associated vegetation cover is returned to its original state. 	Project Company (ESG Manager supported by third party subcontractors)	From COD Monitoring and maintenance throughout O&M phase	PCFM report (annual) Vegetation and habitat restoration report (annual)

Biodiversity impact	Commitment	Responsibility	Timeframe/ deadline	Monitoring measures
	<ul style="list-style-type: none"> Implement appropriate lighting and noise controls. Monitor effects of displacement. Implement monitoring program. 			
Introduction/ spread of invasive alien plants	<ul style="list-style-type: none"> Implement monitoring program. Establish protocols to minimize introduction of invasive alien species. 	Project Company (ESG Manager supported by third party subcontractors)	From COD Monitoring and maintenance throughout O&M phase	Vegetation and habitat restoration report (annual)
Habitat Degradation / Fragmentation / Direct Loss of Species- Spermophilus citellus & Lutra lutra	<ul style="list-style-type: none"> Monitor habitat restoration (BMP-1) Noise control. Post-construction monitoring. Control speed of vehicles. Implement adaptive management plan Conduct regular inspections and maintenance. Develop protocols minimize human presence and vehicle 	Project Company (ESG Manager supported by third party subcontractors)	From COD Monitoring and maintenance throughout O&M phase	Monthly O&M reporting Noise control procedure PCFM report (annual) Annual adaptive management review meeting Site access procedure
Mortality through electrocution on distribution lines	<ul style="list-style-type: none"> Post-construction fatality monitoring Ensure bird safe pylon design. 	Project Company (ESG Manager supported by third party subcontractors)	From COD	PCFM report (annual) Specification for bid safe pylon design
Birds and Bats – direct mortality	<ul style="list-style-type: none"> Develop Post construction Fatality Monitoring programme. Develop adaptive management plan. 	Project Company (ESG Manager supported by third party subcontractors)	From COD	PCFM report (annual) Annual review Vegetation management

Biodiversity impact	Commitment	Responsibility	Timeframe/ deadline	Monitoring measures
	<ul style="list-style-type: none"> • Clear vegetation around the turbines and maintain short cover during operational phase. • Implement lighting systems that minimize attraction of bats. 			

7.7.2 O&M Contractor Responsibilities

The ultimate responsibility for implementing the biodiversity mitigation measures rests with the Project Company. However, specific measures can be delegated to the O&M Contractor and subcontractors / independent experts likely to be involved in BAP implementation and monitoring.

The O&M Contractors will be inducted on the biodiversity requirements and informed on the sensitivities and protocols included in the Project Company’s management plans.

7.8 Community Health and Safety

7.8.1 Project Company responsibilities

After the application of mitigation measures, the impact of the Project on community health and safety will be negligible to minor in case of shadow flicker and visual impacts during operation stage of the Vifor wind farm development.

Ongoing management on operational impacts will be supported by a robust implementation of the community grievance mechanism.

Table 13 Project Company responsibilities - Community Health & Safety

Activity	Project commitment	Responsibility	Timing	Monitoring measures
Activity around the site during O&M works may pose an H&S risk to people using the facility and passers-by.	<ul style="list-style-type: none"> Plan activities to minimise or avoid impacts on communities. Minimise interaction between road users and O&M workers. When working on WTG and other installations provide safety barriers 	Project (CLO) Company	Operations	Incidents reported Grievances received
Workers may pose a GBVH risk to community members	<ul style="list-style-type: none"> As part of the induction training, support the Contractor to conduct awareness training for all workers on gender awareness, sexual harassment and gender-based violence among contractors, project workers, and students. Define and implement a Worker's Code of Conduct including GBVH requirements (Annex F) . Ensure GBVH related disciplinary actions in worker contracts and HR policies to mitigate the risks of Contactors working close to vulnerable persons. 	Project (CLO) Company	Operations	Induction training Worker Code of Conduct including GBVH requirements
Ice throw	<ul style="list-style-type: none"> When snow, freezing rain or freezing fog has occurred or when the temperature drops below 37oF/3oC during precipitation notify via local channels (refer to SEP e.g. Whats App group / text to Commune leaders) to warn local road users of potential for ice throw. If community members are working within 300m of a WTG, request them to notify the CLO so that checks can be performed to confirm presence of ice/compacted snow on the turbine. Conduct awareness campaign on ice throw in the local communes on ice throw. 	Project (CLO) Company	Operations	SE Log

Activity	Project commitment	Responsibility	Timing	Monitoring measures
Shadow Flicker	<ul style="list-style-type: none"> Implementation of the community grievance mechanism covering potential shadow flicker concerns and grievances. Shadow flicker monitoring and verification of each grievance. 	Project (CLO) Company Operations		Shadow flicker verification report CGM Log and minutes of monthly review

7.8.2 O&M Contractor responsibilities

The O&M Contractor will integrate into all plans, procedures, method statements and risk assessments actions for implementing the requirements outlined below.

Table 14: O&M Contractor responsibilities – Community Health & Safety

Activity	Project commitment	Responsibility	Timing	Monitoring measures
Activity around the site during O&M works may pose an H&S risk to people using the facility and passers-by.	<ul style="list-style-type: none"> Plan activities to minimise or avoid impacts on communities. Minimise interaction between road users and O&M workers. When working on WTG and other installations provide safety barriers 	O&M Contractor (HSE Manager)	Operations	OHS Plan
Workers may pose a GBVH risk to community members	<ul style="list-style-type: none"> Ensure all workers attend the mandatory induction training, including GBVH awareness and requirements. Include GBVH related disciplinary actions in worker contracts and HR policies to mitigate the risks of Contractors working close to vulnerable persons. 	O&M Contractor (HSE Manager)	Operations	Induction training GBVH Code of Conduct (Annex F)

7.9 Waste management

7.9.1 Project Company Responsibilities

The Project Company is responsible for removal of waste (general and hazardous) off site for final disposal/treatment.

Table 15: Project company responsibilities - waste management

Activity	Project commitment	Responsibility	Timing	Monitoring measures
<p>Handling, storage, transport and disposal of non-hazardous solid waste</p>	<p>Ensure;</p> <ul style="list-style-type: none"> • Domestic solid waste to be segregated and identified from the other waste streams into separate waste containers clearly to facilitate recycling. • Waste containers will be clearly labelled and placed in designated waste storage locations. Labels will be waterproof, securely attached, and written in Romanian. • For litter (food waste, domestic waste), an adequate number of covered bins will be strategically placed throughout the sites at locations where staff consume food. These will be regularly collected and taken to the waste storage area / landfill. • Food waste will be stored within a sealed metal or plastic bin, in order to prevent pests gaining access. • Heavy waste may be contained within an open skip, provided that segregation occurs effectively enough to remove all lightweight material that could be blown away. • Paper cardboard, metal cans, plastic, glass to be collected for recycling by a licensed waste contractor. • Only licensed waste transporters and waste management facilities will be engaged. • Copies of the waste management license on site. • Develop and maintain a waste inventory to document and track domestic solid wastes generated, segregated, reused and consignments. • Completed waste record reports are required to show the chain of custody of the waste generated on site, its transportation and treatment/disposal. All records will be maintained on site. 	<p>Project Company (ESG Manager)</p>	<p>Operations</p>	<p>Inspection records (any non-compliance recorded in the Project CAP)</p> <p>Training Records (induction) with all workers received training</p>

Activity	Project commitment	Responsibility	Timing	Monitoring measures
Handling, storage, transport and/or disposal of sanitary wastewater	Ensure; <ul style="list-style-type: none"> • Sanitary facilities will be provided with adequately designed underground wastewater storage tanks. • Sanitary wastewater tanks to be properly maintained and inspected to ensure tanks do not overflow. • A licensed waste/wastewater contractor will be engaged for the periodic removal of wastewater tanks. 	Project Company (ESG Manager)	Operations	Contract in place with a licenced wastewater contractor
Handling, storage, transport and/or disposal of solid hazardous waste	Ensure; <ul style="list-style-type: none"> • a hazardous waste inventory to document and track hazardous wastes generated, segregated, reused and consignments. • Segregate and identify hazardous waste from the other waste streams into separate waste containers/skips clearly signed and labelled. • Hazardous waste shall be effectively managed in accordance with existing legislation on hazardous waste, as follows: <ul style="list-style-type: none"> o Is prohibited to illegally dispose of into hazardous waste, o All workers shall be trained in hazardous and non-hazardous waste classification and their handling methods, o Proper facilities should be supplied and areas for hazardous waste storage in the construction sites should be clearly determined according to the law, • Appropriate licensed entities shall be contracted to periodically transport and dispose of hazardous waste, • A record of hazardous waste should be documented to allow monitoring volume of hazardous waste generated in place and disposed by contractors of hazardous waste. The numeric data in the record must be consistent to ensure that no improper disposal is made in the Project area or other 	Project Company (ESG Manager)	Operations	Hazardous waste storage area and Inventory Inspection records (any non-compliance recorded in the Project CAP) Training Records (induction) with all workers received training

Activity	Project commitment	Responsibility	Timing	Monitoring measures
	<p>locations, Store hazardous waste in allocated hard standing areas in sealed containers stored with impermeable bases, sufficient containment and separation capacity, sun/rain shelter, separate drainage system, good ventilation and equipped with spill kits & spill response procedures. This area must be placed away from any sources of ignition.</p> <ul style="list-style-type: none"> Waste containers will be clearly marked with appropriate warning labels to accurately describe their contents and safety precautions. Labels will be waterproof, securely attached, and written in Romanian. Wherever possible, chemicals will be kept in their original container. Contract a licensed contractor to collect, transport and treat domestic, construction and hazardous wastes from Project sites, Prohibit dumping any types of solid waste to the soil, or burning waste of sites. 			
Waste records	<p>Ensure;</p> <ul style="list-style-type: none"> Generated waste quantities - must be recorded in a separate/dedicated register according to the type of waste and the quantities generated. During the waste transfer process, a waste transfer format (Waste Transfer Format) shall be filled out to determine the respective quantities according to the type of waste leaving the site and the name of the company/entity that will handle these wastes. The Developer shall regularly keep waste data during the operation activity and present/report to the government authorities, as required. 	Project Company	Operations - ongoing	Waste reporting (weekly and monthly waste generation volumes for O&M wastes, segregated by waste stream)

7.9.2 O&M Contractor Responsibilities

The O&M Contractors are responsible for collecting waste on site during the works and segregating and storing waste in a suitable location for removal off site by the Project Company in accordance with the requirements in Table 16

Table 16 O&M Contractor responsibilities - waste management

Activity	Project commitment	Responsibility	Timing	Monitoring measures
Waste management planning	<ul style="list-style-type: none"> The O&M Contractor must develop procedures for segregation and storage of waste and the on-site waste facility in compliance with Romanian legislation and GIIP. Materials or chemicals not internationally acceptable as defined by IFC PS3 are prohibited. 	O&M Contractor (HSE Manager)	prior to COD	Operations Waste Management Procedures
Store, handle, transport and dispose of hazardous wastes in line with national regulations and good international industry practice (GIIP).	<ul style="list-style-type: none"> Provide a dedicated temporary hazardous waste storage area with sufficient capacity for anticipated types/volumes of waste) to enable the following: Segregate hazardous from non-hazardous waste. Develop and maintain a hazardous waste inventory to document and track sanitary waste generated and segregated. Use waste containers that are compatible with hazardous waste types and in line with national regulations and good practice. Containers to be sealed and kept in good condition and labelled. Prevent mixture of incompatible wastes that could result in chemical reactions. Provide information on characteristics of each hazardous waste type (using Material Safety Data Sheets (MSDSs). Provide all workers with personal protective equipment (PPE) suitable for handling each waste type, in line with waste characteristics. No burning of hazardous waste. 	O&M Contractor (HSE Manager)	Operations - ongoing	Temporary hazardous waste storage area Inspection records (any non-compliance recorded in the Project CAP) Training Records (induction) with all workers received training
Waste segregation	<ul style="list-style-type: none"> Food/organic waste and recyclables, such as paper, plastic, scrap metal waste, etc. must be appropriately segregated and stored in designated waste bins/containers and periodically deposited in approved disposal areas. 	O&M Contractor (HSE Manager)	Operations - ongoing	Waste records Incident reports

7.10 Labour management

7.9.1 Project Company responsibilities

The OHS impacts during Operations are covered in Section 3.5. Additional to potential OHS incident, labour commitments of the Project must support effective human resources management and recruitment – see Table 17 below.

Table 17 Project Company responsibilities - labour and working conditions

Activity	Commitments	Responsibility	Timing	Monitoring measures
Human resource management	<ul style="list-style-type: none"> Ensure adequate workforce management in line with IFC requirements and the law of Romania (including labour conditions, social security, minimum wage, working hours, no child/forced labour etc.). Require O&M Contractor to conform to Company Labour Policies 	Project Company (ESG Manager)	Prior to start of operations	Human Resources (HR) policies ² aligned with PR2 and national labour regulations.
Employment	<ul style="list-style-type: none"> Employment shall be undertaken and managed according to the Romanian labour law and IFC PS2. Enhance, as possible, local employment through sourcing employees from the direct Social Aoi All recruitment to be transparent with careful consideration of any hiring through agencies or seasonal workforce. Develop labour reporting statistics for all workers, including identifying labour statistics per worker category 	Project Company (ESG Manager)	Operations – ongoing	HR Policy and associated documentation Labour statistics maintained
Working terms and conditions	<ul style="list-style-type: none"> Comply with the Labour Code of Romania Workers must all be contracted; no casual or day labour will be used. 	Project Company (ESG Manager)	Operations – ongoing	Human Resources (HR) policies aligned with PR2 and national labour regulations.

²Human resources policies are the formal rules and guidelines that Contractors should have / put in place to hire, train, assess, and reward the members of their workforce. These policies should prevent any form of discrimination in the workplace and ensure that all employees are treated fairly and equally. These policies help employers and employees understand their rights and responsibilities and set clear expectations about how to behave within the organisation. HR policies should be in written form – they may be documented in company handbooks, collective agreements, and may include dedicated policies on specific issues like non-discrimination.

Activity	Commitments	Responsibility	Timing	Monitoring measures
	<ul style="list-style-type: none"> Workers must be provided with a copy of their contract, which includes employer name, salary, working conditions, payment schedule, overtime provisions, leave provisions, disciplinary procedures and termination of the contract, at a minimum. Migrant workers must be contracted under the same conditions as national workers. Workers will be allowed to participate in collective bargaining and/or labour unions Workers to be briefed on their rights at the outset of the work / upon hiring. 			
Worker accommodation	<ul style="list-style-type: none"> Should worker accommodation be provided, policies will be put in place and implemented on the management and quality of accommodation to protect and promote the project workers' health, safety, and well-being. This includes accommodation provided directly by the O&M Contractor or accommodation paid for by the O&M Contractor. 	Project Company (ESG Manager)	Prior to start of operations	Accommodation Management Policy Accommodation Code of Conduct
Worker conduct	<ul style="list-style-type: none"> Prepare a Worker Code of Conduct and require workers (and security personnel) to sign it during their site induction (this must include commitments regarding GBVH expectations) . Worker CoC is provided in Annex E. All employees are to sign the Workers' Code of Conduct containing a set of rules on behavioural standards and cultural awareness requirements for all employees (including security personnel (as defined in the SeMP) 	Project Company (ESG Manager)	Prior to start of operations COC signed within two weeks of the appointment of each contractor and sub-contractor on-site	Worker Code of Conduct Signed Code of Conduct (for each worker)
Employment (local)	<ul style="list-style-type: none"> Prioritise hiring from local area where suitably qualified personnel are available. Embed commitments to transparent recruitment process, based on merit and free of discrimination. This is to be reflected in: <ul style="list-style-type: none"> Selection criteria, job profiles, and number of workers for the operations phase with specific attention to the enhancement of the local community, women, and vulnerable groups' employment. 	Project Company (ESG Manager)	Operations – ongoing	O&M Labour statistics disaggregated by gender and skill level.

Activity	Commitments	Responsibility	Timing	Monitoring measures
	<ul style="list-style-type: none"> ▪ Description of the Worker’s Code of Conduct, highlighting labour conditions with an aim to reduce the risk of gender-based violence and harassment. ▪ Details of worker’s grievance mechanism that will be disclosed during the recruitment process and the employment period. ▪ Documentation that will outline labour rights, such as the working hours, compensation for overtime, and any additional employee benefits. The documentation will also highlight the workers’ right to self-organization and collective agreements. ▪ Use inclusive vocabulary in job descriptions to encourage women and other vulnerable groups to apply. • Engage with training institutions to provide training programs and skills upgrading. • Offer apprenticeship and partner with local contractors to provide apprenticeship programmes. • Offer scholarships to encourage high school graduation and encourage interest in the industry. • Frequently and in advance, communicate (local radio, Facebook, local online media, or other media) within the Social Aol, the Project schedule, the type and jobs to be offered at the Project, education and skill requirements/ qualification criteria, and information on how to apply for jobs to increase local interest; 			
Worker grievances	<ul style="list-style-type: none"> • Specify designated, trained grievance officer • Provide an anonymous and confidential channel of communication for Workers to give feedback and report grievances to the Project Company’s team (as per Annex E). The Workers’ grievance mechanism should include the elements outlined below: 	Project Company (ESG Manager)	Operations – ongoing	<p>Worker grievance mechanism implemented, with frequent reminders</p> <p>Worker Grievance log</p>

Activity	Commitments	Responsibility	Timing	Monitoring measures
	<ul style="list-style-type: none"> ○ Step 1- Worker submits grievance using the worker’s grievance form (refer to OESMP). ○ Step 2 – Project Company grievance manager records, screens and acknowledges grievance. ○ Step 3 – Grievance manager investigates grievance and analyses information collected to determine next steps. ○ Step 4 – Take appropriate action to resolve grievance as necessary and as discussed and agreed with the complainant; and ● Step 5 – Follow up and close out; the grievance manager contacts complainant after a specified time period to verify satisfactory outcome and take further action if required. Worker grievance mechanism to be established on site and open to all workers specifying timescale for acknowledgement and resolution ● In WGM procedure (Annex E) , describe GBVH-specific provisions (eg multiple entry points and appropriately trained personnel and links to GVH service providers) ● Worker grievance Mechanism (Annex E) to be communicated to all Workers during on boarding and regularly thereafter ● Anonymised WG reporting will be performed by postng the grievance and actions taken in a way so as not to highlight where or who may have raised the grievance. 			<p>Monthly audit report</p>
Worker training	<ul style="list-style-type: none"> ● Ensure all workers receive the appropriate training as per the training need analysis and matrix developed under the ESMS, including training on the WGM (note specific requirements for working within a substation or on live equipment). ● Confirm training and re/up skilling programmes available for the local workforce. This is to include: <ul style="list-style-type: none"> ● Identification of entry-level jobs that do not require prior experience and education and provide on-the-job training. ● Develop career plans and skill upgrading for hired employees to help them advance and reach more skilled and senior 	Project Company (ESG Manager)	Operations – ongoing	<p># of local persons hired on the Project</p> <p># of female workers hired</p> <p># of grievances related to equality/discrimination etc.</p>

Activity	Commitments	Responsibility	Timing	Monitoring measures
	<p>positions and to enable progress from construction to O&M jobs.</p> <ul style="list-style-type: none"> • Monitor gender breakdown of training and employment as part of annual monitoring to measure gender balance. • Ensure equality in remuneration for workers of the same skill level, regardless of gender, age, sexual orientation, religion, or nationality. • Follow established policies and internal best practices to promote harassment free workplace; health, safety, and security; and multi-cultural and individual considerations. • Clearly and frequently, communicate labour rights 			
Worker health	<ul style="list-style-type: none"> • Workers should be made aware of the health and environmental risks associated with any hazardous substances used and should be provided with appropriate protective clothing (PPE) / equipment in case of spillages or accidents. • Ensure appropriate welfare provisions (water, shelter, sanitary facilities, food) at the Site. 	Project Company (ESG Manager)	Operations – ongoing	Worker induction records Training records
Child Labour	<ul style="list-style-type: none"> • Minimum age restrictions in compliance with national law 	Project Company	Operations – ongoing	Employment records

7.10 O&M Contractor responsibilities

The O&M Contractor must put in place provisions to ensure the following requirements are met and outline this in a **Worker Management and Recruitment CMP**, including the minimum requirements set out in Table 18.

Table 18 O&M Contractor (and subcontractors)- Minimum requirements for labour and working conditions

Activity	Requirement	Responsibility	Timing	Monitoring measure
Human resource management	<ul style="list-style-type: none"> Ensure adequate workforce management in line with IFC requirements and the law of Romania (including labour conditions, social security, minimum wage, working hours, no child/forced labour etc.). 	O&M Contractor (HR Manager)	Prior to entrance on site	Human Resources (HR) policies ³ aligned with PR2 and national labour regulations.
Employment	<ul style="list-style-type: none"> O&M Contractor to conform to Company Human Resources (HR) Policy, Code of Ethics, Policy Against Bribery and Corruption, Recruiting Policy, Supply Chain (Procurement) Policy, Communication Policy and Worker Code of Conduct. O&M Contractors to demonstrate functioning HR policies to meet with Lender requirements, ILO core conventions and Romanian law in contractor contracts, non-discrimination, gender equity, in line with EU Law and romaine regulation. O&M Contractors to develop labour reporting statistics for all workers, including identifying labour statistics per worker category 	O&M Contractor (HR Manager)	Operations – ongoing	<p>HR Policy and associated documentation</p> <p>Labour statistics maintained</p>
Working terms and conditions	<ul style="list-style-type: none"> Comply with the Labour Code of Romania Workers must all be contracted; no casual or day labour will be used. Workers must be provided with a copy of their contract, which includes employer name, salary, working conditions, payment schedule, overtime provisions, leave provisions, disciplinary procedures and termination of the contract, at a minimum. Migrant workers must be contracted under the same conditions as national workers. 	O&M Contractor (HR Manager)	Operations – ongoing	Human Resources (HR) policies aligned with PS2 and national labour regulations.

³Human resources policies are the formal rules and guidelines that Contractors should have / put in place to hire, train, assess, and reward the members of their workforce. These policies should prevent any form of discrimination in the workplace and ensure that all employees are treated fairly and equally. These policies help employers and employees understand their rights and responsibilities and set clear expectations about how to behave within the organisation. HR policies should be in written form – they may be documented in company handbooks, collective agreements, and may include dedicated policies on specific issues like non-discrimination.

Activity	Requirement	Responsibility	Timing	Monitoring measure
	<ul style="list-style-type: none"> Workers will be allowed to participate in collective bargaining and/or labour unions. Project O&M Contractors will negotiate in good faith with such collectives if required. Workers to be briefed on their rights at the outset of the work / upon hiring. 			
Worker conduct	<ul style="list-style-type: none"> Ensure all employees sign the Workers' Code of Conduct of the Project 	O&M Contractor (HR Manager)	Prior to O&M site activity and ongoing COC signed within two weeks of the appointment of each contractor and sub-contractor on-site	Worker Code of Conduct Signed Code of Conduct (for each worker)
Employment (local)	<ul style="list-style-type: none"> Prioritise hiring from local area, where suitably qualified personnel are available. Embed commitments to transparent recruitment process, based on merit and free of discrimination. This is to be reflected in: <ul style="list-style-type: none"> Selection criteria, job profiles, and number of workers for the construction phase with specific attention to the enhancement of the local community, women, and vulnerable groups' employment. Description of the Worker's Code of Conduct, highlighting labour conditions with an aim to reduce the risk of gender-based violence and harassment. Details of worker's grievance mechanism that will be disclosed during the recruitment process and the employment period. Documentation that will outline labour rights, such as the working hours, compensation for overtime, and any additional employee benefits. The documentation will also highlight the 	O&M Contractor (HR Manager)	Ongoing	O&M Labour statistics disaggregated by gender and skill level. Local Employment and Procurement Procedure

Activity	Requirement	Responsibility	Timing	Monitoring measure
	<p>workers' right to self-organization and collective agreements.</p> <ul style="list-style-type: none"> Use inclusive vocabulary in job descriptions to encourage women and other vulnerable groups to apply. 			
Worker grievances	<ul style="list-style-type: none"> Provide an anonymous and confidential channel of communication for Workers to give feedback and report grievances via the Projects' Workers Grievance Mechanism to be established on site open to all workers. Support the dissemination of the mechanism and the communication to all Workers during on boarding and regularly thereafter 	O&M Contractor (HR Manager)	Prior to O&M site activity and ongoing	Worker grievance mechanism implementation
Worker training	<ul style="list-style-type: none"> Ensure all workers receive the appropriate training as per the training matrix, including training on the WGM (Annex E) (note specific requirements for working within a substation or on live equipment). Follow established policies and internal best practices to promote harassment free workplace; health, safety, and security; and multi-cultural and individual considerations. Clearly and frequently, communicate labour rights 	O&M Contractor (HR Manager)	Prior to O&M site activity and ongoing	<p># of local persons hired on the Project</p> <p># of female workers hired</p> <p>No grievances related to equality/discrimination etc.</p>
Worker health	<ul style="list-style-type: none"> Workers should be made aware of the health and environmental risks associated with any hazardous substances used and should be provided with appropriate protective clothing (PPE) / equipment in case of spillages or accidents. Ensure appropriate welfare provisions (water, shelter, sanitary facilities, food) at the Site. 	O&M Contractor (HR Manager)	Prior to O&M site activity and ongoing	Worker induction records
Child Labour	<ul style="list-style-type: none"> Minimum age restrictions in compliance with national law 	O&M Contractor (HR Manager)	Oper Prior to O&M site activity and ongoing	Employment records provided upon request

7.11 Security

7.11.1 Project Company

FLS will be responsible for the care, custody and control of all the work and all materials and equipment during the operations phase. FLS will be responsible for keeping unauthorized encroachment and/or persons off the Project site where O&M works are to be performed under the Contract.

FLS shall adhere to the requirements of the IFC Good Practice Handbook on Use of Security Forces: Assessing and Managing Risks and Impacts, 2017.

FLS will make provision for the following:

- Site access procedure to manage the equipment, companies and workers who will access the site.
- Site access procedure for contractors and visitors.

All persons on site and visitors must go through a Site induction as defined in Section 5.1.

FLS will perform an operational **Security Risk Assessment** to confirm potential risks and to define actions to minimise the risk. Based on the outcome of the Security Risk Assessment FLS will prepare a site **Security Management Plan (SMP)** and engage security personnel/or private security contractors to implement security at site two weeks prior to mobilisation on site. All security companies and personnel will be subject to country licensing, vetting and personnel background checks prior to engagement on the Project and all security personnel will be trained in the use of force and human rights principles.

It is expected that remote security devices (CCTV, cameras) will be used long-term for providing the necessary security at site.

FLS will inform the affected communities that they may use the community grievance mechanism to express concerns about security personnel. It will investigate any allegations of unlawful or abusive acts of security personnel and take the necessary action to prevent recurrence.

All security personnel are required to read, acknowledge and sign the Owner Code of Conduct for Security Personnel and undergo human rights training.

7.11.2 O&M Contractor

During maintenance works and normal operation, the O&M Contractors must be responsible for the care, custody and control of contractors' equipment.

Authorized persons shall be limited to the O&M Contractor's Personnel, the Owners Personnel and any other personnel notified by the Owner to the O&M Contractor as authorized personnel.

O&M Contractors are responsible for leaving the site secure – locked turbines, gates, offices, etc.

8 E&S Communication

8.1 External communication

8.1.1 Stakeholder engagement

The Project Stakeholder Engagement Plan (SEP) is the principal document governing how Project-related stakeholder engagement is managed. The SEP includes a full description of the community (external grievance mechanism) including how grievances are recorded and tracked, and the frequency of collection and reporting.

The O&M Contractor HSE Manager is responsible for providing the Project CLO with a detailed schedule and sufficient notice of Project activities that are likely to impact local communities to allow for transparent and effective communication to local residents and stakeholders of upcoming O&M activities, especially when works may cause temporary disruption. During this communication, the CLO will provide clear points of contact for complaints or concerns. Communication will be in Romanian with key messages in other local languages as appropriate.

The O&M Contractor will notify the CLO with sufficient notice to inform communities of the pending work scope as listed above, as well as the duration of tasks and location of activities in particular movement of abnormal loads.

The O&M Contractor must pass on all externally (community) generated grievances to the CLO for logging and review within 24 hours. The O&M Contractor must work with the CLO to resolve grievances following the grievance mechanism set out in the SEP. The CLO will handle onward reporting to stakeholders.

The CLO will be responsible for reporting engagement and grievance-related data. Details of the grievance mechanism are included in the Project Company's Stakeholder Engagement Plan (SEP) developed for Operations.

8.1.2 External grievance mechanism

An overarching Project Community Grievance Mechanism (CGM) is established in compliance with IFC PS1 / EBRD PR10 requirements to ensure that all comments, suggestions, and objections received from the Project stakeholders, especially from the nearby communities and facilities, are dealt with appropriately and promptly. The CGM is an important feedback mechanism that can improve Project impact and mitigate the risks.

This CGM will be available to all Project stakeholders, enabling them to submit questions, comments, suggestions and/or complaints and provide feedback on all Project-related activities. The primary grievance focal point will be the S Project Company CLO, who will be responsible for the overall implementation of the GM. In addition, grievance submission may be performed via all the entry points defined in the SEP (email, written, directly at site). The contact information of both entities will be provided at all locations where the work is being performed and during information disclosure activities.

The Project Company CLO will keep a Project grievance log containing all grievances received by the Project (from a local third party), monitor the resolution of the grievance, and ensure the grievances are closed out promptly, under the coordination of the ESG Manager and Site Manager.

Grievances can be raised during the O&M phase through the following methods:

- Via mail or e-mail: vifor@rezolv.energy

- On the Project website: <https://vifor.energy/contact/>
- Via telephone: +40 774 423 454
- During public meetings and consultations
- Submission of a Community grievance registration form (provided in Annex B): e.g. via O&M Subcontractor on site during maintenance works.

8.2 Meetings

The Project Company will adopt a programme of E&S meetings monthly for review of ESHS matters. This may be part of the monthly O&M meeting. The purpose of the meetings will be to ensure the active participation and commitment of the O&M Contractors to implement the OESMP and to disseminate information to key personnel, communicate E&S performance, report and discuss any incidents, review the progress of corrective actions; and assign responsibilities/actions or additional resources where required. The O&M Contractor Site Manager (or their delegate) will keep a record of the meeting agenda signed minutes, and actions.

The O&M Contractor personnel will include HSE considerations in all meetings. .

9 ESHS Training

9.1 Induction

The Project will develop an integrated ESHS Induction to cover, as a minimum the following topics.

The induction will be prepared and delivered by the O&M Contractor HSE Responsible Person and approved by the FLS HSEQ Manager:

- Project HSE programme & policy and implications for the working methods and responsibilities for all employees.
- Site/project-specific HSE guidelines/rules.
- Emergency evacuation process and emergency contacts.
- First-aid facilities etc.
- Work permit procedures.
- Road safety management.
- Personal protective equipment (PPE).
- Use of fire extinguishers and lifesaving equipment.
- Environmental & social awareness.
- Environment management - housekeeping.
- Waste management.
- Reporting accidents/incidents/unsafe conditions and acts/near misses.
- Chemical handling and spill response.
- Induction on O&M Contractor HSE plan.
- Worker Code of Conduct and workers' grievance mechanism; and
- Community engagement and safety.

The Project Company will sign off on the content of ESHS Induction materials.

9.1.1 General training

The O&M Contractor shall ensure that all personnel should receive environmental awareness and best-practice training as part of their induction and ongoing professional development.

9.1.2 Specialist training

The O&M Contractor shall ensure specialized training is given for handling hazardous materials and other topics as appropriate as they arise.

Specialist training may include:

1. Setting to work briefing (before specific maintenance works)
2. General toolbox talks
3. Task-specific training (in the field)
4. Specialist training / pre-qualified training (by a qualified third party)
5. First aid training

Training that may be provided via the different approaches is summarised in Table 19. The Operations Manager (or their delegate) will maintain a training and competence matrix for all roles under their control.

Table 19 Types of training

Training Types and Audience	Types of training
Setting to work /toolbox talks - all employees	<ul style="list-style-type: none"> • Emergency Preparedness and Response • Near miss and incident reporting • PPE • Hazard identification • Good Housekeeping • First aid • Waste management • Accident prevention • Manual handling • Permit to Work
Task-specific training - specific employees as identified during the Job Hazard Analysis and risk assessment	<ul style="list-style-type: none"> • Hand and power tools • Crane operation (including crane signal and rigging practices) • Lifting • Working at heights (scaffolding and ladder, fall arrest systems) and rescue training • Hazardous material handling • Driver training (appropriate to specific vehicle) • Electrical safety • Lockout tagout (LOTO) procedures • Welding safety
First Aid training - all employees	<ul style="list-style-type: none"> • Essential life support and resuscitation (CPR and mouth-to-mouth resuscitation) • Unconsciousness • Shock • Fractures • Burns • Control of bleeding, wound dressing • Choking • First aid for minor injuries • Common illnesses, seizures, eye injuries and heart attacks

10 Monitoring and auditing

10.1 Monitoring requirements

Performance and compliance with the OESMP and Lender obligations are monitored via a yearly Lenders' audit of the ESAP implementation. As necessary, additional third-party audits may also be implemented to confirm compliance.

E&S performance is monitored monthly by the Project Company, including the KPIs reported by O&M contractors and service providers via monthly and quarterly reports. Specific responsibility is assigned to the HSEQ Manager. The KPI's are defined in the OESMS Manual.

Any non-compliance will be followed up by the HSEQ Manager and reported in a non-compliance report issued to the Project for rectification. The non-compliance report will include an outline of the non-compliance issue, action for rectification, timelines for implementation and responsibility. Non-compliance will be tracked in a project Corrective Action Plan. The non-conformance procedure is elaborated in the OESMS Manual.

Where applicable, the O&M Contractor will monitor and measure the performance of its activities regularly to assess whether the Project is complying with legal requirements, is meeting its policy commitments, achieving established objectives and targets, and meeting key performance indicators (KPIs) as set out in the OESMS and the monitoring measures defined in this OESMP and conforming to the requirements of the Project as defined in this OESMP. Monitoring will include:

- Relevant aspects and impact (i.e., air quality, noise, waste)
- The authority/entity that will receive the monitoring report
- Document source reference (where applicable)
- Monitoring requirements: elaborate on what should be monitored, where samples should be taken and when the monitoring should be done
- Parameters to check
- Frequency and duration of monitoring.

Biodiversity monitoring is outlined in the Project Biodiversity Management and Monitoring Plan (BMMP) and Biodiversity Action Plan (BAP). Livelihood reporting is conducted in accordance with the LRP provisions.

Table 20: Summary of Project KPIs for the Operation and Maintenance phase*⁴

What	How	When	Why	Who
Fair and equitable labour practices	% of worker grievances resolved on time Type of grievances	Monthly	Labour welfare	<ul style="list-style-type: none"> Project Company O&M Contractor
Occupational health and safety	% Incident investigation completed on time Lost time injury frequency rate by O&M Contractors Man hours worked		Public and workplace health and safety	<ul style="list-style-type: none"> Project Company O&M Contractor
Waste management	Total waste generated (refer to Form B, Annex C) including % Waste to landfill (segregated by hazardous and non-hazardous waste) % recycling (segregated by hazardous and non-hazardous waste)		Timely completion of all waste disposal	<ul style="list-style-type: none"> Project Company O&M Contractor (HSE officer)
Hazardous materials	100% of materials have MSDS and risk assessment		All risks related to materials are understood and managed on-site	<ul style="list-style-type: none"> Project Company O&M Contractor
Monitor community relations	Number and type of community complaints received (disaggregated by type: environmental, employment, security, CHS)		Identification of community concerns before they escalate	<ul style="list-style-type: none"> Project Company
Implement an effective grievance mechanism	% community complaints received by contractors resolved within 30 days		Identification of community concerns before they escalate	<ul style="list-style-type: none"> Project Company
Training	100% of all employees, workers, and visitors receive site induction		Timely completion of all training	<ul style="list-style-type: none"> Project Company O&M Contractor
Energy consumption	Total energy consumption		To identify energy savings because of the Project.	<ul style="list-style-type: none"> Project Company O&M Contractor
Water use	Total water consumption		To identify water-saving opportunities	<ul style="list-style-type: none"> Project Company O&M Contractor
Local Hiring	% of local hires		To assess against local hiring targets	<ul style="list-style-type: none"> Project Company O&M Contractor
Workers conduct	100% of workers signed the worker code of conduct	To address worker conduct (including GBVH) matters.	<ul style="list-style-type: none"> Project Company O&M Contractor 	

⁴ Excluding biodiversity KPIs, which are in the Project BMMP & BAP.

What	How	When	Why	Who
Project related GBVH grievances	Number of GBVH project-related grievances reported		To address worker conduct (including GBVH) matters.	<ul style="list-style-type: none"> • Project Company • O&M Contractor

10.2 Audit requirements

10.2.1 Project Company

The O&M Contractor HSEQ Manager Yes, the will implement the following audit plan for the Project to supervise and measure the management system's effectiveness. The audit program will be through a combination of inspections and audits (internal and third-party):

- Not less than 6 monthly O&M E&S and OHS audits (when work is being performed at VWF)
- Maintenance work closure audit; and
- Unscheduled audits - can be undertaken at any time, concerning HSE and labour matters.

For further detail refer to section 7.0 of the OESMS Manual.

10.2.2 O&M Contractor

During O&M works, the O&M Contractor work team (or third-party sub-contractor) will evaluate the compliance status of its activities and operations against the requirements of the OESMP at an appropriate frequency, including, as appropriate:

- Weekly HSE inspections / walkovers (may include FLS/O&M Contractor)
- Monthly HSE audits (where work extends for a prolonged period)

The findings from all inspections and audits arising from inspection findings will be recorded and tracked according to the '**Corrective Action Plan**'. The O&M Contractor and the Project Company shall agree on the methods/procedures and timeframes to close any non-compliance findings.

The Contractor must set out the responsible person, scope and frequency in the Contractor HSE Plan.

10.2.3 Third-party

In addition, the Project Company will coordinate independent yearly third-party audits on behalf of the Financing institutions "ESG Lenders Audit" against the requirements of the OESMP and the Lender ESAP.

10.3 Review and continuous improvement

The Project Company will work closely with the O&M Contractor to identify ways to avoid or minimise E&S impacts.

Through the operation of the Project, the O&M Contractor will continue to find and implement ways to reduce impacts and deliver positive outcomes through each stage of the Project. The results of site inspections, audits and incident reports will be used to drive continuous improvement.

11 Reporting

11.1 Near miss and incident reporting

In the event of an OHS or E&S incident, the Contractor HSE Responsible Person must initiate an Incident Report is to be completed, including a review of the cause (root cause analysis), and

determination of the appropriate action required, resulting in definition of a relevant corrective action(s). The corrective actions will be approved by the Owner HSEQ Manager

All near misses, non-conformances and associated corrective actions must be tracked via a 'Corrective Action Plan' to monitor the close out of all corrective actions. Close out and progress will be monitored during the monthly O&M progress meetings.

Any changes in the OESMP documentation as required by the corrective action shall be reflected by amending respective procedures or instructions. The Contractor HSE Responsible person or the Employer E&S or HSEQ Manager will make the updates to the required documentation as relevant. The O&M Contractor shall ensure these changes are communicated to all relevant staff.

The O&M Contractor must establish an operating procedure for an incident investigation that aligns with the categories set out in Table 21.

Table 21 Project incident and accident reporting requirements

Incident category	Definition	Project KPI
Fatality	Death occurring on the Site ⁵ .	Zero fatalities
Lost time injury	A severe injury ⁶ which results in a worker being incapacitated for more than three consecutive days.	Zero lost time injury
First aid injury	Incident that causes an injury or illness which requires limited treatment available at the Site	100% of first-aid treatments recorded in the site log and reviewed in daily coordination meeting.
Incidents / near misses	Actions that can potentially cause injury, ill health, or loss in the areas of environmental, health & safety, security and labour management.	100% near-miss incidents resolved within 24 hours of observation
Worker complaints	Complaints about work that are carried out in unsafe or unhealthy conditions	All complaints are resolved following the worker grievance redress procedure
Property damage (community)	The incident that causes damage to property outside the project ownership (community property) has not been agreed in advance.	100% of complaints resolved following the grievance redress procedure and the accidental damage procedure
Security incident	An incident that involves security guards or other law enforcement officials. This may or may not result in an injury (which should be reported separately).	100% of complaints resolved following the community grievance mechanism

⁵ Fatalities arising from natural causes may be excluded after analysis if a natural death can be demonstrated.

⁶ LTI and TRI rate: number of LTIs or TRIs per 1 000 000 hours worked (1 000 000 hours correspond to 100 full-time workers during a year = 40 hours per week 50 weeks) to be compared against industry standards

Incident category	Definition	Project KPI
Vehicle accidents	An incident that involves a project vehicle (e.g., during delivery of equipment or personnel) that occurs off-site.	Zero transportation incidents
Environmental incident	An incident involves an impact (unplanned emission) on the environment (air, water, land).	100% environmental incidents resolved within five working days (as recorded in the Corrective Action Plan)

The O&M Contractor HSE Responsible Person or Site Manager must notify the Project Company Operations Manager or other representative if not available (e.g. ESG Manager) immediately, or as soon as reasonably possible and not more than 4 (four) hours of a fatality or dangerous occurrence.

All incidents must be recorded (this includes near misses even if no incident report is produced) in the weekly statistics provided in the Monthly Progress Report.

11.2 E&S and H&S reporting

11.2.1 Project Company

An annual report developed by the Project Company will include the information on E&S and stakeholder engagement activities relevant to VWF during the reporting period.

The outline for the annual report is defined in Annex D.

- A summary of the implementation of the Grievance Mechanism and grievances received (The information will be anonymous; no identifying information on specific individuals will be included in the reporting).

The Project Company will provide a monthly report to Project Owner on ESHS compliance on site and status against the project ESAP and other Lender requirements. The outline for the Monthly report is provided in Annex D

Data from the contractor to feed into the Annual and monthly reporting will be via the report outlined in section 11.2.2 below and the forms in Annex C.

11.2.2 O&M Contractor

The O&M Contractor shall provide a written report to the Project Company on a monthly providing the relevant information defined below:

- Labour indicators (disaggregated by gender and age)
- Number of workers on site (per subcontractor) (split weekly)
- Working hours and overtime (total)
- Maximum standard hours worked
- Number of subcontractors on site
- Environmental, health, safety and social status report
- E&S personnel (changes/additions)
- NCR, observation and corrective action plan status
- Worker grievances
- E&S indicators (waste, fuel use, electricity, drills, inductions, grievances etc)

- Number of drills performed
- Local hiring
- Number of personnel inducted (and signed code of conduct)

The forms in Annex C may be used for this purpose.

11.3 Stakeholder reporting

The Project Company will provide an annual report to stakeholders summarising key information about the Project and its performance.

In addition, the O&M Contractor will provide periodic updates and notifications via communication methods identified in the SEP for essential E&S information.

12 Document management

Control of ESHS, security and labour-related documentation will be following the document management procedure in the ESMS.

Up-to-date records will be maintained and retained for at least three (3) years or as stipulated under Romanian and European laws for data protection.

The O&M Contractors will maintain a complete and up-to-date **E&S file** of all relevant sources of information. The information in the E&S file will be available to the O&M Contractors and Project Company at any time.

The ESMS documentation will include, among other things:

- The current version of the O&M Contractor OESMP
- O&M Contractor or O&M subcontractor method statements and procedures
- Organogram and definition of roles and responsibilities
- O&M Contractor training records
- Correspondence concerning environmental matters/permits, including internal and external
- Record of required KPIs and related statistics

13 Management Review

FLS HSEQ Manager collaborates with the O&M Contractors and other project parties to explore opportunities for optimising facility operations, aiming to reduce project-related ESHS impacts, risks, and hazards on an ongoing basis as part of the monthly progress review meetings. .

Collectively, the O&M team from FLS and the Contractor must work on continuously identifying and putting into practice methods that lessen negative effects and promote beneficial outcomes as driven by the Project corrective action plan and outcomes of incident investigations. .

Findings from site inspections, audits, and incident reports are also used to inform strategic reviews and improvements as part of the Annual Management Review (AMR) as defined in the OESMS Manual.

Annexes

Annex A – National regulation

General Legislation

- Law no. 50/1991 regarding the authorization of execution of construction works (Law no. 50/1991).
- Government Decision no. 839/2009 for the approval of the Methodological Norms of application of Law no. 50/1991.
- Law no. 350/2001 regarding territorial landscape and urban planning (Law no. 350/2001).
- Order no. 233/2016 for the approval of the Methodological Norms of application of Law no. 350/2001.
- Government Decision no. 525/1996 for the approval of the general urbanism regulation.

General Environmental Legislation

- Law on Environmental Protection no. 137/1995, amended several times.
- Law on Environmental Impact Assessment no. 92/2018
- Law on Ambient Air Quality 104/2011
- Law on Waters no. Law on Waters 107/1996
- Law on Nature Protection no. 49/2011 amending Law no. 57/2007
- Law on Waste no. 92/2021
- Law on Protection against Noise 121/2019

Biodiversity and Protected Areas

- Emergency Government Ordinance no. 57/2007 on the regime of protected natural areas, the preserve of natural habitats, wild flora and fauna – which transposes Directive 79/409/EEC on the conservation of wild birds, the Habitats Directive 92/43/EEC and Directive 2006/105/EC adapting Directives 73/239/EEC, 74/557/EEC and 2002/83/EC in the field of environment, by reason of the accession of Romania and Romania;
- Government Decision no. 663/2016 setting up the protected natural areas and declaring special protection areas, as integral part of the European ecological network Natura 2000 in Romania.
- Government Decision no. 1284/2007 regarding the institution of bird protection areas as integral part of Natura 2000 European ecological network in Romania – which transposes the Habitats Directive 92/43/EEC.
- Order no. 46/2016 establishing protected natural areas and declaring the sites of community importance as an integral part of the European ecological network Natura 2000 in Romania.
- Order no. 1964/2007 on the institution of the protected natural area regime for sites of community importance as integral part of Natura 2000 European ecological network in Romania, which transposes the Birds Directive 2009/147/EC.
- Law no. 5/2000 re the approval of the Spatial Planning of the National Territory – Section III – protected areas.

Emissions and Air Quality

- Law no. 278/2013 on industrial emissions – which transposes the Industrial Emissions Directive 2010/75/EU.

- Emergency Government Ordinance no. 104/2001 on ambient air quality – which transposes the Ambient Air Quality Directive 2008/50/EC and Directive 2004/107/EC relating to arsenic, cadmium, mercury, nickel and polycyclic aromatic hydrocarbons in ambient air.
- Government Decision no. 780/2006 establishing a scheme for greenhouse gas emission allowance trading – which transposes Directive 2003/87/EC establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC.

Water

- Water Law no. 107/1996 – transposing Directive 2000/60/EC establishing a framework for Community action in the field of water policy and Directive 2007/60/EC on the assessment and management of flood risks.
- Law no. 458/2002 on the drinking water quality – which transposes Articles 9 and 15 of the Drinking Water Directive 98/83/EC.
- Order no. 662/2006 approving the Procedure and competencies for the issuance of water management permits and authorizations.
- Order no. 1406/2003 approving the Methodology for the quick assessment of environmental and human health hazards.
- Order no. 15/2006 re the approval of the Procedure for the temporary suspension of the water management authorizations and of the Procedure for amending and withdrawal of water management permits and authorizations.

Soil / Contaminated Land

- Government Decision no. 1408/2007 on the methods of investigation and assessment of soil and subsoil pollution.
- Government Decision no. 1403/2007 on the rehabilitation of the areas where the soil, subsoil and ecosystems were affected.

Noise (Airborne)

- Government Decision no. 321/2005 in relation to the assessment and management of environmental noise – which transposes Environmental Noise Directive 2002/49/EC.

Wastes and Chemical Substances

- Law no. 249/2015 relating to packaging and packaging waste – which transposes Packaging and Packaging Waste Directive 94/62/EC.
- Law no. 211/2011 on waste regime – which transposes the Waste Framework Directive 2008/98/EC.
- Law no. 360/2003 in relation to waste and hazardous materials management.
- Emergency Government Ordinance no. 196/2005 on the Environmental Fund.
- Government Decision no. 570 / 2016 regarding the approval of the Program for controlled elimination of evacuations, emissions and losses of priority dangerous substances and other measures concerning the main pollutants – which transposes Directive 2008/105/CE, Directive 2009/90/CE and Directive 2013/39/UE.
- Government Decision no. 477/2009 establishing the applicable sanctions for failure to comply with the provisions of Regulation no. 1907/2006/EC concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals, establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93

and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC;

- Government Decision no. 1061/2008 on the transport of hazardous and non-hazardous waste on the Romanian territory.
- Government Decision no. 235/2007 regarding management of waste oils.
- Government Decision no. 856/2002 on waste management evidence and approving the waste list, including hazardous waste.
- Order no. 1084/2003 approving the Notification procedures for activities posing major accident hazards involving dangerous substances and the respective major accidents.
- Order no. 757/2004 approving the technical norms storage. storage;

National Legislation on Social Aspects

- Land Law no. 18/1991.
- Law on Cadastre no. 105/2019
- Law on Property and other al Rights no. 185/2018
- Law no. 247/2005 on property and justice reform and some accompanying measures, with special references on Legal circulation of land; amended by Decision 597/2020 on the exception of unconstitutionality conditioning the right to compensation of the holders of compensation titles, for his selection of a certain mode of compensation.
- Government Emergency Ordinance 34/2013 on the organization, management and operation of permanent grassland, and amending and supplementing Law 18/1991 on Land Reclamation.
- Law on Road Traffic Safety no. 195/2002
- Government Ordinance no. 43/1997 on roads regime.
- Law on Labour no. 53/2003
- Government Decision no. 600/2007 regarding protection of young employees against economic exploitation, transposing Directive 92/33/CE concerning protection of young employees at workplace.

Cultural Heritage

- Law on Cultural Heritage no. 422/2001 and subsequent amendments no. 26/2008 and no. 451/2002
- Law no. 182/2000 on the protection of the national cultural movable heritage.
- Government Ordinance no. 43/2000 on the protection of the national cultural heritage and the declaration of some archaeological sites as of national interest.
- Government Ordinance no. 68/1994 on the protection of national cultural heritage.
- Order no. 2361/2010 approving the List of Historical Monuments 2010.
- Order no. 2562/2010 approving the Procedure for granting archaeological research authorizations.
- Order no. 2260/2008 approving the Methodological norms for classification and evidence of historical monuments.
- Order no. 2518/2007 approving the Methodology for enforcement of the archaeological discharge procedure.

- Order no. 2392/2004 regarding the Standards and procedures in archaeology.
- Order no. 2682/2003 approving the Methodological guidelines regarding the classification and recording of the historical monuments, the List of Historical Monuments, the Analytical record card for historical monuments and the Minimal record card for recording historical monuments.
- Ordinance no. 43/2000 on the protection of the archaeological heritage and declaring certain archaeological sites as national interest areas Ministry of Culture.
- Decision no. 2314/2004 re the approval of the list of historical monuments and missing monuments.

Health and Safety

- Law no. 64/2008 on the safe operation of pressure vessels, lifting equipment and fuel-consuming devices.
- Law no. 319/2006 on safety and health at work, which transposes Directive 89/391/EEC on the introduction of measures to encourage improvements in the safety and health of workers at work.
- Government Decision no. 1425/2006 for approving the Methodological Norms for application of Law no. 319/2006.
- Law no. 307/2006 on fire safety.
- The Labour Code, approved by Law no. 53/2003.
- Government Decision no. 571/2016 approving the categories of buildings and facilities which are subject to endorsement and/or authorization for fire safety.
- Government Decision no. 971/2006 on the minimum requirements for the provision of safety and/or health signs at work - which transposes Directive 92/58/EEC on the minimum requirements for the provision of safety and/or health signs at work.
- Government Decision no. 1091/2006 on the minimum safety and health requirements for the workplace - which transposes Directive 1989/654/EEC Directive 1989/654 concerning the minimum safety and health requirements for the workplace.
- Government Decision no. 1146/2006 on the minimum safety and health requirements for using work equipment, transposing Directive 1989/655/CEE on the minimum requirements for using work equipment by workers.
- Order no. 163/2007 approving the General fire safety norms.
- Government Decision no. 493/2006 on the minimum requirements for protection of safety and health protection of workers against hazards arisen from exposure to noise, transposing Directive 2003/10/CE concerning the minimum safety and health requirements for protection of workers exposed to noise.
- Government Decision no. 1048/2006 on the minimum requirements for personal protective equipment worn by workers, transposing Directive 89/656/CEE concerning the minimum safety and health requirements for using PPE by workers in the workplace.
- Government Decision no. 1051/2006 on the minimum requirements for health & safety of workers involved in manual handling of loads, transposing Directive 90/269/CEE concerning minimum safety and health requirements for manual handling of loads.
- Government Decision no. 1218/2006 on the minimum requirements for health & safety protection of employees exposed to hazards arisen from chemical agents, transposing Directive 98/24/CE concerning protection of health and safety of workers exposed to chemical agents in the workplace.

- Government Decision no. 355/2007 regarding workers health surveillance.
- Order no.427/2002 regarding minimal First Aid Kit inventory for workplaces without specialized medical assistance.
- Order no. 3/2007 regarding approval of template for Reporting of Incidents.ncidents;
- Order no. 867/2007 regarding approval of Romanian standards lists harmonized with European standards referring to pressurized equipment.
- Government Decision no. 557/2007 on the minimum requirements for health & safety protection of special types of employees (fixed term contract employees/ temporary employees hired via crewing agencies).
- Government Emergency Decision no. 99/2000 regarding applicable control measures for health & safety protection of workers during periods of extreme weather conditions.
- Government Emergency Decision no. 96/2003 regarding protection of new and expectant mothers in the workplace, transposing Directive 92/85/CEE concerning protection of new or expectant mothers on the workplace.
- Government Decision no. 1876/2005 on the minimum health & safety protection of employees exposed to vibration, transposing Directive 2002/44/CE concerning minimum health and safety requirements applicable for workers exposed to risks generated by vibrations.
- Government Decision no. 115/2004 on establishing of essential PPE safety requirements and conditions for admittance on national market.

Annex B – Project ESAP

Annex B.1 – Vifor 1 ESAP

See separate document.

Annex B.2 – Vifor 2 ESAP

See separate document.

Annex C – O&M Reporting Forms

FORM A – HSE and Social Statistics

Indicator	Jan	Feb	Mar	Apr	May	Jun	Jul	..
Fatality								
Dangerous occurrences / Major injury <i>(or Reportable injury as defined under OSH Law)</i>								
Lost Time injury								
First Aid injury⁷								
H&S Incidents⁸								
Property incident								
Security incident								
Environmental incident								
Social Incident								
Near miss								
Non-compliance (legal)								
Non-conformance (OESMS)								
Number of Employee Grievances submitted								
Number of Employee Grievances resolved								
Worker Grievance: GBV/SEA/SH								

⁷ First aid is immediate treatment given to the injured person until the proper medical is reached

⁸ Any unplanned or unintended event or circumstance which could have resulted or did result in harm to a person

Total working hours

FORM B – Environmental and Social Data (operation)

Indicator	Jan	Feb	Mar	Apr	May	Jun	Jul	..
Noise exceedances ⁹								
Shadow Flicker exceedances ¹⁰								
Water consumption (m3)								
Drinking water (m3)								
Total wastewater discharges (m3)								
Hazardous solid waste (<i>volume and type</i>)								
Hazardous liquid waste (<i>volume and type</i>)								
Non-hazardous waste (<i>volume and type</i>)								
Recycled (solid) (<i>volume and type</i>)								
Recycled (liquid) (<i>volume and type</i>)								
Key equipment fuel use (<i>quantities according to fuel type</i>)								
Transport vehicle's fuel use (<i>quantities according to fuel type</i>)								
Electricity consumed								
Community Grievances								

⁹ Noise monitoring will be performed in case of noise related grievances.

¹⁰ Shadow Flicker monitoring will be performed in case of shadow flicker related grievances.

FORM C - Labour Statistics

Indicator	Local*		Romanian		International	
	M	F	M	F	M	F

Low-skilled worker

Semi-skilled worker

Skilled worker

Managerial position

Total

*Local is defined as from Buzau County

Annex D: Form of HSEQ and E&S Monthly and Annual Report

1. Executive Summary

As of this reporting period, there are XXX ESHS personnel and XXX other site staffs.

Company	E&S and HSE Personnel	Administrative Staff	Worker
FLS			
Contracor			

2. Environmental, Health, Safety and Social Status Report Permits and Authorisations

SN.	Title / Description	Remarks (new, existing, non-compliances)

2.1 ESHS Significant Actions of the Project

2.1.1 ESHS Documentation development

Following plans have been issued / updated:

SN.	Reference Code	Rev. #	Title / Description

Plans to be issued for upcoming reporting period:

SN.	Reference Code	Rev. #	Title / Description	Expected Submission Date

Method statements to be provided for review during the reporting period:

SN.	Reference Code	Rev. #	Title / Description	Actual Submission Date

2.1.2 ESHS Personnel

O&M Contractor staffing :

XXX

2.1.3 Communication (site)

ESHs communication activities during reporting period (ESHs committees, etc.):

XXX

2.1.4 Audits

ESHS Audits (internal and external) during reporting period:

XXX

2.1.5 Training

ESHS training activities during the reporting period:

Training Statistics -Month, Year

Content	Total Sessions	Total Trainees	One Session Time/Minutes	Total Training Man hours	Responsible Company
ESHS Induction					
GBV initiatives/awareness training					
HR induction					
Specific Training 1					
Specific Training 2					
Total					

2.1.6 Corrective Action plan Status

CAP (E&S)	Total number of actions	Number of open actions	Number of actions passed due date

The CAR (Corrective Action Register) will be developed and provided as an attachment to the ESHS Monthly Report for non-conformance.

2.1.7 Works stopped

XXX

2.2 Photographic report

Details	Pictures
Details	Pictures

--	--

2.3 Monitoring plan

Monitoring	Parameter	Exceedances during the reporting period
other		

2.4 Inspection analysis

XXX

2.5 Accident analysis

XXX

2.5.1 Hours

SUBCONTRACTOR	Nº WORKERS	HOURS	DIRECT	HOURS	INDIRECT	HOURS
SUB1						
SUB2						
.....						
HEI						
TOTAL						

2.5.2 Accidents / incidents

XXX

TYPE OF ACCIDENT	# Month		DESCRIPTION
	Nº	DATE	
	0	XX/XX/XXXX	

2.5.2.1 Description of accident / incident

- First incident occurred on XX/XX/XXXX
- XXX

- The Significant Accident / incident reports will be developed and provided as an attachment to the Project ESHS Monthly Report.

3. E&S and labor indicators

3.1 H&S indicators

Health and Safety Indicators	Month	Cumulative to Date
Fatalities		
Lost Time Injuries (LTI)		
Days Lost - LTI		
Restricted Work Cases (RWC)		
Days Replaced by RWC		
Medical Treatment Cases (MWC)		
First Aid Cases (FAC)		
Near Misses (NM)		
Number of ESHS Exercises/Drills		
Number of Health and Safety Inspections		
Number of Health and Safety Walkdowns		
Unsafe Acts		
Unsafe Conditions		
Number of RCA (root cause analysis) Completed		
Number of RCA (root cause analysis) Outstanding		
Number of Covid Positive cases		
Number of Malaria + Cases (Clinic)		
Road Traffic Accidents (RTA)		
Property Damage (except RTA's)		
Environmental Incidents		
Number of Hours Worked from NTP		
EHS Specific Training Attendees		
EHS Induction Training Attendees		
Toolbox Talks		
Toolbox Talks Attendees		

3.2 E&S Indicators

Waste Indicators (Type)	Year (volume)	Cumulative
Non-hazardous waste		
Hazardous Waste		
Recycled waste		

Drinking water		
Construction water		
Wastewater discharged at third party		
Fuel (Machinery and vehicles)		
Groundwater Level Monitoring (average)		

Key equipment fuel use (quantities according to fuel type)

Fuel (Machinery)	Month(quantities according to fuel type)	Cumulative
Fuel (Machinery) –gasoline(L)		
Fuel (generators)- gasoline(L)		
Transport vehicles fuel use –gasoline(L)		
Fuel (Machinery) –diesel(L)		
Fuel (generators)- diesel(L)		
Transport vehicles fuel use –diesel(L)		
Electricity consumed (MWH)		
Natural gas (m3)		

- Corrective Actions completed / outstanding :
- Number of E&S audits :
- Toolbox meetings held :
- ESHS exercises or drills :
- Completed E&S inductions :
- Local Employment - number and type of contracts issued (local) :
- Overtime (~ workers exceeding 50 hours per week) :
- Worker and community grievances received/ resolved :
- Disciplinary actions :

3.3 Labour indicators

Total Number of Construction employees hired (cumulative)		
CONSTRUCTION EMPLOYEES		
Gender		%
	Men	
	Women	

	Total		
Age			
	Age:	Male	Female
	Under 25 Years Old		
	25 years old and above		
	Total		

- Number of minority group workers :
- Number of hours worked by males and females :
- Number of workers employed from the local communities :
- Number of workers employed from the region :
- Number of workers employed from the country :
- Number of workers employed from outside of the country borders :
- Number of Workers transportation:

3.4 Worker Grievances

Description	Month	Cumulative	Notes:
Total number of worker grievances			
New worker Grievances this reporting period:			
Total number of worker grievances resolved			
Open Worker Grievances			

Annex E: Worker Grievance Mechanism

Introduction

Grievance mechanisms are essential processes to obtain access to remedy for workers when laws, policies or business practices may fail to protect and respect workers' rights. This section sets out the principles for the workers' grievance mechanism to be implemented by the EPC Contractor and overseen / supported by the Owner. This should be read in conjunction with the workers code of conduct and this LMP.

Scope

This grievance mechanism covers the Owner, Contractor and subcontractor workforce too and relates to all types of workplace grievances that may arise and can refer to a concern, unhappiness or discontent that a worker may experience. Grievances may arise for a variety of reasons. Examples of reasons that may lead an employee to file a grievance include, but are not limited to, the following: Poor working conditions (e.g. the working room does not have sufficient lighting, or ventilation, the space assigned to the work is not sufficient to safely conduct the work, poorly heated or cooled working premises) and poor accommodation facilities

Personal relations or GBVH (e.g. a supervisor has used physical or verbal harassment; there is a conflict between co-workers)

Violation of contractual rights (e.g. payment is systematically delayed; there are illegal deductions; forced overtime, unpaid overtime at the required premium rate or it is paid in a lower amount than initially agreed)

Human and labour rights (e.g. a worker has suffered discrimination based on gender; religion; place of origin; a worker has been punished because of attending a trade union meeting; the water available during working time is not drinkable)

Others: customary rights (e.g. requesting time to pray or to participate in community activities)

Reporting channels

The Owner shall ensure the following channels for submitting a grievance are available to workers:

Verbal complaint to line manager or supervisor;

via sealed box on site (can also be anonymous); and

E-mail to supervisor or person in charge of grievances (via grievance form or otherwise)

All information collected as part of the grievance process will be kept fully confidential and processed by the Grievance Manager.

Roles and responsibilities

Table 22: Roles and responsibilities - worker grievance mechanism

Role/position title	Responsibility

Role/position title	Responsibility
<p>EPC Nominated person (Grievance Manager) supported by Owner and other necessary representatives based on the nature of the grievance (together the Grievance Committee)</p> <p>(NB – GBVH grievance will be routed to a specialist external third party for investigation and processing)</p>	<p>Provide acknowledgement</p> <p>Employee investigating the grievance and liaising with Workers</p> <p>Developing resolutions and actions to rectify any issues.</p> <p>Training on handling grievances sensitivity and routing GBVH grievance to correct channels.</p> <p>Follow up and track progress of grievance.</p> <p>Document any interactions with external stakeholders</p>
Employees	<p>Use the grievance mechanism to report grievances when they arise</p> <p>To consider the need for third party support with grievance submission</p> <p>To participate in the grievance process as outlined in this procedure to seek a mutually acceptable outcome</p> <p>Seek external redress if a grievance has not been resolved through the established grievance mechanism of third parties.</p>
Owner	<p>Review implementation of the grievance mechanism by the Contractor with reference to international standards.</p> <p>Review close out of grievances in the grievance log</p> <p>Report worker grievances to external third parties (e.g. specialist external third party in the case of grievances concerning GBVH).</p>

Worker grievance mechanism procedure

When a grievance is raised the procedural steps described in

should be implemented.

The Grievance Committee will nominate a single person (Grievance Manager) to be responsible for coordinating grievance responses. Each worker is entitled to hold an open and constructive meeting about a grievance with their immediate supervisor or manager and the right to submit a grievance anonymously.

Step 1: Submit grievance

The grievance form requires the following basic information:

Details of the person raising the grievance (not mandatory)

Description of the actual grievance

Identification information and date reported

A template for a grievance form is provided in at the end of this document (Worker grievance form)

Step 2: Record, screen and acknowledge the grievance

The Grievance Manager will log all formal grievances in the Worker Grievance Register and Grievance Forms will be saved as per site document control procedures. A grievance will be acknowledged, by the Grievance Manager, within two working days of a grievance being submitted. Communication will be made either verbally or in written form. The acknowledgement of a grievance should include a summary of the grievance, method that will be taken to resolve the grievance and an estimated timeframe in which the grievance will be resolved. If required, the acknowledgment provides an opportunity to ask for any additional information or to clarify any issues.

Step 3: Analyse grievance

The Grievance Manager supported by the Grievance Committee is responsible for investigating the grievance.

In the case of GBVH grievances, these will be routed to a qualified third party¹¹ to follow up to obtain informed consent, conduct the investigation and route the survivor to third party support services (health, justice) as necessary. The GM and GC won't have any direct role in the investigation of GBVH offences except to receive information about the referrals made for the survivor, findings, sanctions required to be taken by the GM. No sensitive information will be shared.

The following information should be provided when a report is made:

Date and nature of the allegation (i.e., basic type of GBVH at issue)

Gender and age range of survivor

Whether the allegation involves project workers (including contractors) as either the survivor or accused person

Whether the survivor was offered support services (but not information about the services they chose to receive)

Who is leading the response, whether an investigation will occur, final outcome

The third party will retain information on:

Any identifying information about complainants/survivors and accused persons

Detailed investigation reports, interview statements, witness information, letters confirming disciplinary actions, medical documentation or any other evidence related to an incident

Information on whether a survivor decided to pursue services such as counselling—the services the survivor chooses to access are confidential to them

Any other details that could compromise confidentiality

¹¹ This will be an external expert The expert dealing with GBVH issues will be trained and qualified. All GBVH issues should be processed anonymously and logged in a separate GBVH grievance log to ensure full confidentiality.

For non GBVH grievances, the investigation may require the Grievance Committee to make site visits, consult employees, and complete other activities. Records of meetings, discussions and activities all need to be recorded during the investigation. Information gathered during the investigation will be analysed and will assist in determining how the grievance is handled and what steps need to be taken in order to resolve the grievance. This step will aim to be completed with 10 days. Where the investigation or resolution may take longer, the Grievance Manager will inform the complainant as soon as possible to agree an appropriate timeframe for completion.

Step 4: Act

Following the investigation, the Grievance Manager will use the findings to create an action plan outlining steps to be taken in order to resolve the grievance. This is to be discussed with the complainant. The Grievance Manager is responsible for assigning actions, monitoring actions undertaken and making sure deadlines are adhered to. Once all actions have been completed and Grievance Manager feels the grievance has been resolved, they will then formally advise the complainant via their preferred method of contact. The Grievance Manager should consider one or more of the following options/forms of remedy under the worker 'grievance mechanism:

Restitution – the restoration to the original situation violations occurred. This can include restoration of employment, where workers were for example dismissed for complaining or for attempting to organise.

Compensation – would usually come in the forms of damages – material and non-material, and would include financial compensation for lost earnings and potential earnings, lost opportunities – including employment, repayment of debt or fees (for example where excessive or unlawful recruitment fees were charged by agencies; and reimbursement of costs of treatment, legal fees and other services)

Rehabilitation – would include provision of care and treatment, such as physiological and other medical treatment.

Satisfaction – these types of remedies would include public statement of truth, such as acknowledgement of the harm done to the workers, a public apology and restoring the reputation of the workers (for example ensuring that there are removed from any blacklists).

Guarantee of non-repetition – these types of remedies relate to preventative mechanisms and systemic change, such as ensuring that codes of conduct and policies are adhered to or improved; or that an operational grievance mechanism is put in place and a trade union is engaged in a workplace.

Step 5: Follow up and close out

The Grievance Manager will contact the complainant within 5 days after the grievance is raised to verify that the outcome was satisfied and also gather any feedback on the grievance process. Minutes of the meeting will be recorded and saved in accordance with Contractor document control procedure. If required Grievance Manager may need to follow up on numerous occasions to confirm all parties are satisfied.

Appeals and misuse of the grievance mechanism

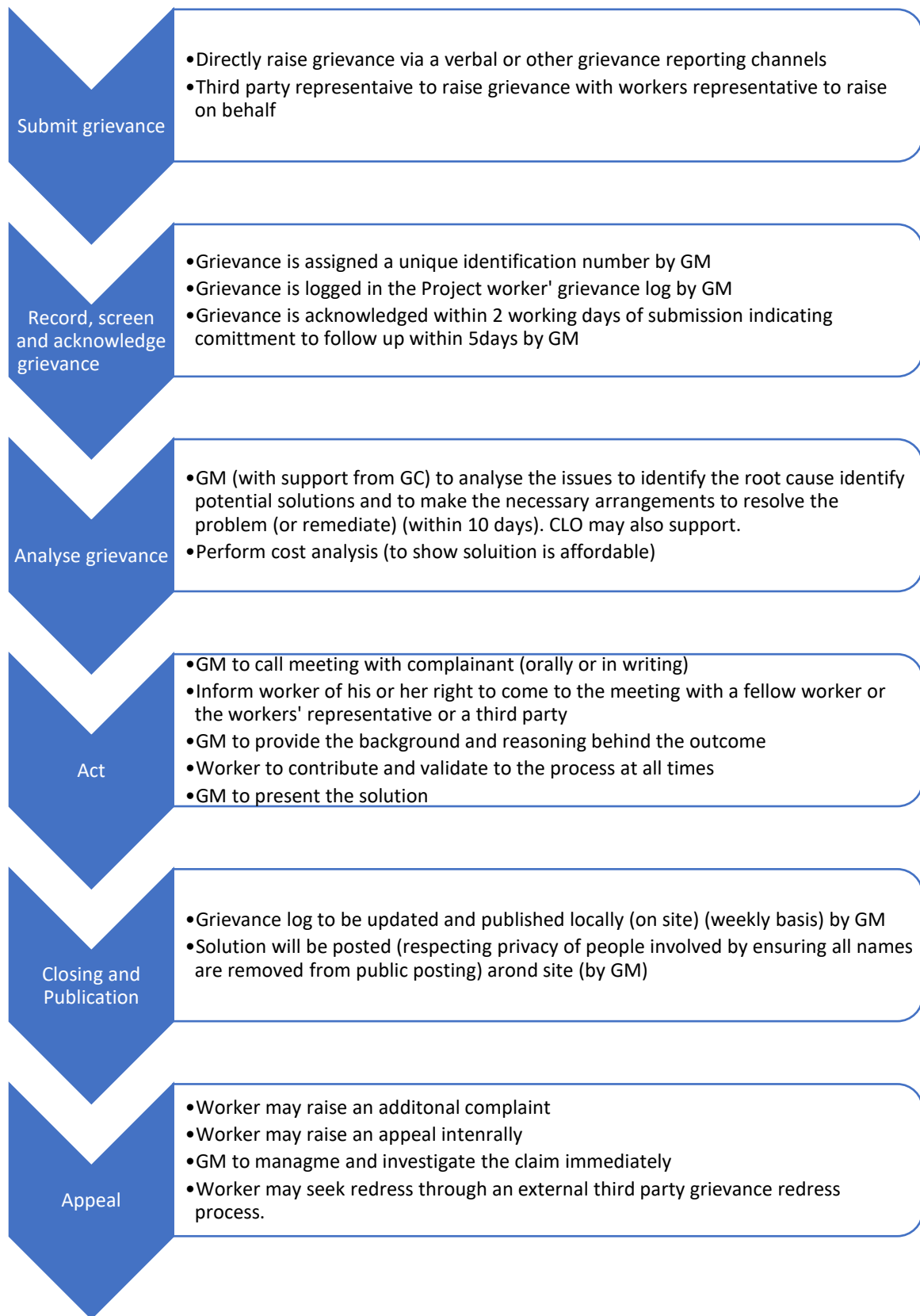
Disagreement on the analysis and proposed corrective actions as well as any delay on the implementation of agreed corrective measures are grounds for appeal. In addition, the worker may raise an additional complaint if she/he believes to have been victimised or harassed in the way in which her/his grievance has been dealt with. The management should investigate the worker's claim immediately.

During training on the grievance mechanism, it will be made clear that any retaliation against workers raising complaints will not be tolerated. The grievance mechanism will also fully protect survivors of workplace violence and sexual harassment. Misuse of the grievance mechanism to victimise or harass workers should be disciplined (including dismissal of the supervisor or manager) as this behaviour compromises the integrity of the mechanism.

The worker must be made aware of their right to:

appeal to a more senior manager against a decision made by the Grievance Manager.
be accompanied by a fellow worker of her/his own choice or by a union representative (applicable for unionised facilities) when attending the meeting to discuss a grievance or an appeal.

Figure 4: Worker grievance mechanism process



13.1.1 National rights

The workers may seek other channels of appeal outside the company. These depend on the national laws and the different arbitration processes and platforms available in the region to address workers' complaints. The Contractor should recognise the legitimacy of these alternative channels and make these known to the workers.

Training

All managers, supervisors and workers must be fully briefed on the workers grievance mechanism through the site induction and notices around the site in languages that are understandable to workers.

Communicating the grievance mechanism

The Contractor must communicate the grievance mechanism in the following ways: +

Display copies of the mechanism procedure on all notice boards that are seen by workers

Induction training: all workers should be made aware of the mechanism and given a hard copy of the mechanism procedure as well as the grievance form (in languages that are understandable to workers).

The induction awareness training should include information on what is a grievance, how to raise it, where to get the necessary forms, where to hand them in and where to go for information on the mechanism. The induction process should clarify that grievances raised will be handled in a confidential manner and ensure that all personal and other important information is kept confidential. Details about the worker GRM will also be included in the employee handbook

Reporting

The Contractor will record (on a weekly basis) the following information as part of the grievance log:

Date of the complaint,
Description (in general terms),
Investigation and conciliation measures taken,
Final remedy taken and the date of the solution

Worker grievance form

A template for the worker grievance form is provided below.

Grievance Form			
Name:			Please do not use my name
Company:			
Date:		Time:	
Preferred method of Contact	Telephone	<input type="checkbox"/>	
	E-mail	<input type="checkbox"/>	
	Face to face	<input type="checkbox"/>	
	Confirm contact details	_____	
Preferred language	Romania:	<input type="checkbox"/>	
	Hungarian:	<input type="checkbox"/>	
	Roma:	<input type="checkbox"/>	
	Other	<input type="checkbox"/>	_____
Please provide details of your grievance including suggestion(s) as to how you would like the grievance to be resolved			

Annex F: Worker Grievance Mechanism

Vifor Wind Farm Project: Code of conduct for Workers (including security personnel)

Mission: First Look Solutions S.A. is committed to developing renewable wind energy in a manner which limits impacts to the environment, biodiversity and local community interests

Key Obligations: The following code of conduct sets out the responsibilities of all workers with regard to working site conditions and interactions with stakeholders and communities. It is strictly forbidden to:

- Discriminate against others on the basis of family status, ethnicity, race, gender, religion, language, marital status, age, disability (physical and mental), sexual orientation, gender identity, political conviction or social, civic, property, birth or health status, including HIV status.
- Use child, forced or compulsory labour.
- Consume or possess, use or sell drugs and/or alcohol.
- Intervene with archaeological sites or historic-cultural heritage.
- Intervene or damage vegetation, flora or crops in the area.
- To undertake hunting or fishing or otherwise capture animals.
- Collect fruits, seeds, wood or other resource on land.
- Dispose of waste in an uncontrolled manner or pollute water resources.
- Enter the realm of others property, without explicit permission.
- Accept services or favours from the regulators, community or individuals.
- To carry any weapon that may endanger yourself or other personnel, unless properly authorised and trained to carry it.
- Commit to any action or provide any benefits to communities.
- Ask for prostitution or other illegal services in local communities.
- To undertake any illegal gambling and fighting.
- Not use the latrines provided.
- Disrespect co-workers and communities at all times.
- Participate in harassment, bullying.
- Not take all reasonable precautions to prevent the spread of communicable diseases (i.e. illness caused by viruses or bacteria that people spread to one another through contact with contaminated surfaces, bodily fluids, blood products, insect bites, or through the air
- Engage in GBV. GBV is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e. gender) differences between males and females. GBV includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private. The term GBV is used to underscore systemic inequality between males and females (which exists in every society in the world) and acts as a unifying and foundational characteristic of most forms of violence perpetrated against women and girls and includes Rape, sexual Assault, Sexual Harassment, sexual exploitation, physical assault, forced marriage, denial of resources of opportunities or services, Psychological /emotional abuse, Violence against children.

The Worker must Comply with this Code of Conduct and all applicable laws, regulations, and other requirements to protect the health, safety, and well-being of other Contractor Personnel and any other person. Specifically, the Worker shall:

- Treat other people with respect, including other Contractor Personnel and local community members.
- Complete the trainings that will be provided by the Contractor related to the environmental and social aspects of the Contract, including on health and safety matters, GBV, and the Grievance Redress Mechanism (GRM)
- Use the GRM to report violations of this Code of Conduct.
- Not retaliate against any person who reports violations of this Code of Conduct, whether to the Employer or the Contractor, including through the use of the GRM.
- Not attempt to manage / address grievances reported by members of local communities and other external stakeholders directly but to report all grievances to their supervisor or the Owner CLO.

Raising Concerns

Owner, Contractor and Subcontractor Personnel should report any observed behaviour that may represent a violation of this Code of Conduct, or that is otherwise of concern. There will be no retaliation against any person who raises a concern in good faith about any behaviour prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

Consequences of Violating the Code of Conduct

Any violation of this Code of Conduct by Contractor Personnel may result in serious consequences, up to and including termination and case referral to legal authorities. The different types of penalties applied will be proportionate to the gravity of the infraction and aligned with the stipulations of the national Labour Law. Penalties may include the below.

- Verbal reprimand;
- Written reprimand;
- Suspension from work with loss of pay, for up to ten days for every disciplinary offence and up to thirty days per calendar year;
- Fine of up to twenty days' wages;
- Demotion to an occupational grade immediately below, for a period not exceeding one year;
- Dismissal.

Contractor Personnel

I have received a copy of this Code of Conduct (as provided by the Owner/EPC) written in a language that I comprehend.

I have received training on this Code of Conduct and on GBV specifically.

I understand that if I have any questions about this Code of Conduct, I can contact [enter relevant Contractor's contact person] requesting an explanation.

I will comply with this Code of Conduct

I will avoid actions or behaviours that could be construed as GBV.

I understand that any action inconsistent with this Code of Conduct or failure to take action mandated by this Code of Conduct may result in disciplinary action and may affect or end my ongoing employment.

First Name(s): _____

Last Name: _____

Gender (circle one): M F

Contractor: _____

Title: _____

Signature: _____

Date: (day month year): _____

