



# Fergana Eco City Regional Hospital

Framework for Environmental & Social Management

ESIA - Volume 3

## Vision Invest

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### Appendix A Project's Legal Framework

## Acronyms and Abbreviations

| Abbreviation | Full Description                                                 |
|--------------|------------------------------------------------------------------|
| AAQM         | Ambient Air Quality Monitoring                                   |
| DFC          | United States International Development Finance Corporation      |
| ICU          | Intensive Care Unit                                              |
| IFC          | International Finance Corporation                                |
| iHFG         | International Health Facility Guidelines                         |
| E&S          | Environmental and Social                                         |
| EBRD         | European Bank for Reconstruction and Development                 |
| EDGE         | Excellence in Design for Greater Efficiencies                    |
| EHS          | Environmental Health and Safety                                  |
| EPC          | Engineering, Procurement, and Construction                       |
| EIA          | Environmental Impact Assessment                                  |
| EP           | Equator Principles                                               |
| ESIA         | Environmental and Social Impact Assessment                       |
| ESR          | Environmental and Social Requirements                            |
| FM           | Facility Management                                              |
| GIS          | Geographic Information System                                    |
| GIIP         | Good International Industry Practice                             |
| GHG          | Green House Gas                                                  |
| HVAC         | Heating, Ventilation, and Air Conditioning                       |
| HPZ          | Health Protection Zone                                           |
| HSE          | Health, Safety and Environmental                                 |
| IPCC         | Intergovernmental Panel on Climate Change                        |
| ILO          | International Labour Organization                                |
| IT           | Information Technology                                           |
| JV           | Joint Venture                                                    |
| KOC          | KOC Construction Mekanik Elektrik FE LLC                         |
| MDAs         | Ministries, Departments and Agencies                             |
| MEEPCC       | Ministry of Ecology, Environmental Protection and Climate Change |
| MoEF         | Ministry of Economy and Finance                                  |
| MoH          | Ministry of Health                                               |
| NCECC        | National Committee on Ecology and Climate Change                 |
| NFPA         | National Fire Protection Association                             |
| NTS          | Non-Technical Summary                                            |
| PC           | Project Company                                                  |
| PPPA         | Public-Private Partnership Agreement                             |

| Abbreviation | Full Description                                      |
|--------------|-------------------------------------------------------|
| PPP          | Public-Private Partnership                            |
| SD           | Safety Data Sheets                                    |
| SEE          | State Environmental Expertise                         |
| SPV          | Special Purpose Vehicle                               |
| UHC          | Universal Health Coverage                             |
| UN           | United Nations                                        |
| UNFCCC       | United Nations Framework Convention on Climate Change |
| US           | United States                                         |
| VOC          | Volatile Organic Compound                             |
| WBG          | World Bank Group                                      |
| WHO          | World Health Organisation                             |

# 1 Introduction

This Framework for Environmental and Social (E&S) Management serves as the implementation framework for the Fergana Eco City Hospital (the Project), building upon the outcomes of the Environmental and Social Impact Assessment (ESIA) prepared for the Project.

The purpose of this Framework is to outline the structure, roles and responsibilities for the Environmental and Social Management System (ESMS) to be developed and implemented by the relevant parties during both the construction and operational phases. It translates the findings and commitments of the ESIA into a practical management framework by setting out how the applicable E&S standards, mitigation, management and monitoring measures presented in ESIA Volume 2 will be implemented through systematic processes and procedures.

The applicable E&S standards include the requirements of the Republic of Uzbekistan, and the Project Lenders. At this stage, it is understood that International Finance Corporation (IFC), European Bank for Reconstruction and Development (EBRD) and United States (US) International Development Finance Corporation (DFC) are the main Lenders in discussions relating to potential project finance. The key E&S requirements for the respective Lenders which the Project will align with are outlined in **Appendix A**.

For the avoidance of doubt, this framework is not an implementation document under the Project's ESMS, but rather, sets the guidance for the ultimate development of the ESMS by the project implementing parties to align with ESIA commitments.

## 2 Environmental & Social Management System

The Project's ESMS will be developed to provide a systematic structure and approach to enable the effective implementation and management of E&S risks, impacts, opportunities and related compliance.

Effective management of E&S issues will include the following fundamental components as part of any robust ESMS:

- Project specific policies related to the environmental and social considerations (including labour, HR and external stakeholders & affected communities).
- Project-based E&S Objectives, Targets & Programme.
- Applicable E&S legal requirements and other compliance obligations (such as those required by lenders);
- E&S aspects and potential impacts, as early as possible for construction, commissioning and operation phase planning, including the incorporation of environmental and social considerations into staffing requirements, process plans, programming, work orders, required authorisations, and site layout;
- E&S professionals, who have the experience, competence, and training necessary to assess and manage environmental impacts and risks, and carry out specialised E&S management functions including the preparation of Project or activity specific plans and procedures that incorporate the technical requirements presented in this document;
- Prioritisation of management programmes/ strategies with the objective of achieving an overall reduction of risk to human wellbeing and the environment, focusing on the prevention of irreversible and / or significant impacts;
- Favouring strategies (where possible) that eliminate the cause of the impact at its source, for example, by selecting less hazardous materials or processes that avoid the need for environmental controls;
- When impact avoidance is not feasible, incorporating controls to reduce or minimise the possibility and/or magnitude of undesired consequences, for example, with the application of pollution controls to reduce the levels of emitted contaminants;
- Preparing workers, informing and co-operating with nearby communities and relevant stakeholders to respond to emergencies, accidents, including providing technical and financial resources to effectively and safely control such events, and restoring workplace and community environments; and
- Improving environmental & social performance (i.e. for continual improvement) through a combination of ongoing monitoring of facility performance and effective accountability.

Initial implementation of the ESMS will focus on setting and reviewing requirements, determining custodianship within the project team, identifying budgets, establishing target ranges for performance and establishing appropriate data gathering techniques and controls.

Performance ranges will be refined on a regular basis as more data becomes available, in turn enabling more accurate strategy development and benchmarking. As such, the ESMS documents will be treated as living documents, to be updated within a continuous process of improvement. This is undertaken through the 'Plan-Do-Check-Act' approach.

An outline implementation process for ESMS is illustrated in the following figure.



**Figure 2-1 Implementation Outline**

## 2.1 Project Parties

The Project is being developed under the Public Private Partnership (PPP) model and hence there are several parties that will be involved at different stages and responsible for different areas of E&S management.

It's important from the outset that these parties and their responsibilities are set out as part of this framework:

- **Public Partner (Ministry of Health)**

Will be responsible for oversight of the project and serving as the contractual counterparty to the Private Partner.

The Ministry of Health (MoH) will be responsible for all clinical operations. The scope of works and responsibilities of the MoH pertain exclusively to the following:

- Employment of clinical staff (with recruitment and competency obligations and expectations defined at national and regional level),
- The provision of healthcare services, and

- The processing, handling, and storage of personal and patient data in line with MoH and applicable law.

- **Private Partner (SPV-Project Company)**

Will be developed through a joint venture comprising Vision Invest, Azerbaijan Uzbek Investment Company (AUIC), and KOC. A Special Purpose Vehicle (SPV) Project Company (PC) will be established that will assume the responsibilities of the Private Partner under the PPP.

- **EPC Contractor**

Under contract with the SPV-Project Company, the EPC Contractor KOC Construction (KOC) will be responsible for the development of the Project inclusive of the design (in line with the set specifications), construction and commissioning activities.

- **FM Company**

Under contract with the SPV-Project Company, the FM Company, a joint venture comprising Vision Invest and Rekeep World will be responsible for the delivery of facilities management services and lifecycle asset management throughout the 20-year operational term, ensuring compliance with asset availability, performance, and maintenance requirements. Management of certain clinical equipment is within the scope of the Private Partner (through the FM Co.) for a period of 8-years.

## 2.2 ESMS Scope

The ESMS will be developed for implementation across the Project's phases and hence needs to be scaled to the risks and impacts of the respective phases relative to the scope of works per Project implementing party.

The ESMS scope will include the following:

- **Construction Phase**

- SPV construction management;
- EPC Contractor activities, including:
  - Construction of the hospital building on approximately 110,000 m<sup>2</sup>;
  - Temporary site facilities;
  - Worker's accommodation area; and
- Key risks and management requirements related to primary supply chains (which can reasonably be managed).

- **Operations Phase**

- SPV operational activities and management of the hospital;
- Building and facilities management activities by the FM Co. (inclusive of the subcontracted management and servicing of medical equipment for 8-years); and
- Key risks and management requirements related to primary supply chains (which can reasonably be managed).

The SPV does not have, and will not assume, contractual authority or control over MoH's clinical operations, staffing decisions, service delivery protocols, or data management practices. It is understood that the MoH will implement its existing national-level policies, procedures, and internal controls relating to clinical related activities of the Project. Accordingly, this Framework does not create binding obligations on MoH however, the SPV-

Project Company will use its best efforts to encourage the MoH to align with recommendations outlined herein. The SPV-Project Company will, on a best-efforts basis:

- Facilitate coordination between the MoH and the Project's respective E&S management functions to promote alignment of MoH operational practices with the lenders' environmental and social standards;
- Share, upon request, relevant ESMS documents, tools, checklists, and monitoring templates that may support MoH implementation of its existing national policies in a manner consistent with good international industry practice for healthcare facilities; and
- Raise, through established governance and coordination mechanisms, any material environmental or social risks associated with clinical operations that may affect the Project's compliance profile and propose practical mitigation measures for MoH consideration.

**Note:** This framework is prepared primarily for the Private Partner to cascade to the SPV-Project Company and does not constitute a commitment by, or impose new obligations on, the MoH beyond its current statutory and regulatory policies, frameworks, and responsibilities. All references to MoH actions in this document are indicative and intended to support coordination and risk management, not to alter the allocation of responsibilities under the PPP arrangements.

## 2.3 Project E&S Management Structures

This section defines the principal E&S management responsibilities of the parties involved in the development and operation of the Project.

### 2.3.1 SPV-Project Company

The SPV-Project Company will be responsible for ensuring that a Project-level ESMS is established and effectively implemented to manage E&S risks and maintain compliance with applicable E&S requirements.

While responsibility for developing and implementing elements of the ESMS may be contractually delegated to other Project parties (e.g. the EPC Contractor and the FM Company), the SPV-Project Company will retain overall accountability for the ESMS. This includes ensuring that the ESMS is appropriately developed, approved and implemented through effective coordination and oversight, and that all relevant Project parties maintain competent personnel and adequate resources to fulfil their respective E&S responsibilities under the ESMS.

Notwithstanding the above, the SPV-Project Company will:

- Adopt and maintain project a suite of appropriate E&S, OH&S and HR Policies;
- Ensure that the ESMS is proportionate to the Project's E&S risks and is consistent with applicable Uzbek law, lenders requirements (including the applicable standards, ESIA and ESAP obligations), and relevant international standards incorporated into the Project documentation;
- Maintain an appropriately resourced E&S, H&S and community relations function with clearly defined authority, responsibilities, reporting lines, and competency requirements;
- Ensuring relevant E&S related permits are in place prior to applicable project works and that these remain valid (as necessary), with oversight of compliance with related conditions.

- Identify and assess E&S risks and impacts associated with the Project and ensure that under the ESMS the appropriate ESMPs, supporting management plans, procedures, and action plans are in place;
- Incorporate applicable E&S requirements into the EPC Contractor and FM Co. contracts, including cascading such requirements to sub-contractors and key suppliers;
- Review and approve, or require the revision of, the EPC Contractor's and the FM Company's management plans and related processes under the ESMS before commencement of their relevant activities;
- Monitor and evaluate the E&S performance of the EPC Contractor and FM Co. through inspections, audits, reports, meetings, and other verification activities;
- Maintain a system for recording, investigating, reporting, and closing out incidents, non-compliances, complaints, and corrective actions;
- Ensure that serious incidents and material E&S performance issues are reported to the lenders (as per the facility agreement, or ESAP) and relevant authorities in accordance with applicable reporting requirements;
- Manage and maintain a Project grievance mechanism for affected communities and other external stakeholders, while ensuring that any contractor-level grievance channels specific to the Project are established and linked to the same Project mechanism;
- Hold responsibility for implementation of the Stakeholder Engagement Plan (SEP), including coordinating stakeholder engagement and disclosure activities that fall within the Project Company's responsibility and overseeing (or being involved) for engagement by other project parties;
- Use best efforts to communicate relevant E&S expectations to the MoH (where identified in the ESIA and/or this framework to align with lenders requirements) and to facilitate coordination on material E&S risks arising at the interface between clinical operations and Project activities under the SPV-Project Company and/or the FM Co.; and

The Project Company shall retain ultimate accountability under the Project agreements for ensuring that E&S requirements applicable to its contractual scope are implemented. Oversight by the Project Company shall not relieve the EPC Contractor, FM Co. or their subcontractors of their direct responsibility for the work and services under their contracts and control.

### **2.3.2 Ministry of Health**

The MoH is responsible for all clinical operations, including the employment of clinical staff, the provision of healthcare services, the processing, handling, and storage of personal and patient data. For clarity, the delivery of clinical services includes procurement of medical supplies and clinical waste management.

The MoH's responsibilities are expected to be managed through its existing national and institutional policies and standard operating procedures and shall remain separate from the Project's ESMS.

As an indication only and subject to the MoH's statutory mandate and terms of the PPP arrangements, its key responsibilities include:

- Employment and management of clinical staff in accordance with applicable national and regional requirements;

- Establishment and implementation of requirements for clinical staff recruitment, qualifications, competency, training, and professional conduct;
- Provision of healthcare services and management of clinical activities in accordance with applicable Uzbek requirements and MoH procedures;
- Management of clinical risks, patient safety, infection prevention and control, medical ethics, and healthcare service quality within its operational mandate;
- Processing, handling, storing, and protecting personal and patient data in accordance with applicable law and MoH policies;
- Implementing applicable emergency, clinical incident, communicable disease, and patient safeguarding procedures within its area of responsibility;
- Managing complaints and grievances relating specifically to clinical services, patient care, clinical staff, and MoH-controlled activities;
- Participation, where appropriate, in coordination meetings addressing E&S risks at the interface between clinical operations and the SPV-Project Company's activities;
- Sharing of relevant information with the SPV-Project Company where legally permissible and necessary to manage a material Project-related E&S risks;
- Consideration of recommendations communicated by the SPV-Project Company concerning alignment with lender requirements and good international industry practice;

The MoH shall not be required under this Framework to adopt the Project Company's ESMS or to assume new contractual obligations unless expressly agreed in the PPP or other applicable project agreements. The Project Company's role in relation to MoH activities shall be limited to coordination, communication and best-efforts influence.

### 2.3.3 EPC Contractor

The EPC Contractor will operate their own activity-specific procedures and shall implement the requirements applicable to their respective scopes of work, however aligned with the broader Project level ESMS which will further be cascaded to third-party sub-contractors.

The EPC Contractor shall be responsible for managing the E&S risks associated with the design, procurement, construction, testing, and commissioning activities within its scope. This includes:

- Establishing, implementing, and maintaining relevant elements of the Project ESMS under the SPV-Project Company's E&S Policy and broader ESMS manual/framework and applicable E&S requirements;
- Preparing and implementing a Construction ESMP (or CESMP) and supporting method statements and other detailed management plans and procedures before commencing relevant works;
- Ensuring that its personnel, sub-contractors, and suppliers understand and comply with applicable E&S requirements;
- Appointing suitably qualified E&S, health and safety, labour/HR with sufficient authority and resources;
- Compliance with applicable permits (and conditions), approvals, legal requirements, and Project-specific E&S standards and ESMS requirements;
- Management of construction risks, including occupational health and safety, labour and working conditions, worker accommodation, community health and safety, traffic

and transport, waste, hazardous materials, pollution prevention, noise, dust, water use, biodiversity, cultural heritage, and emergency response;

- Implementation of a workers grievance mechanism and ensuring that complaints are recorded, investigated, and addressed in line with the project SEP and with communication of all grievances to the SPV-Project Company for tracking in the projects master GRM tracker;
- Notifying the SPV-Project Company promptly of serious incidents, fatalities, significant injuries, environmental releases, security incidents, allegations of serious labour violations, and other material E&S events;
- Maintaining inspection, training, monitoring, incident, and corrective-action records, with these being available to the SPV-Project Company, regulators and lenders auditors upon request;
- Conducting internal inspections and audits and submitting regular E&S performance reports to the Project Company;
- Ensuring that construction-related E&S obligations are incorporated into sub-contractor agreements;
- Correction of non-compliances within agreed timeframes and cooperate with SPV-Project Company notices/audits and lenders monitoring; and
- Preparation of relevant handover information for the operational phase ESMS (as required), in coordination with the SPV-Project Company and FM Co.

### 2.3.4 FM Company

The FM Co. will operate their own activity-specific procedures and shall implement the requirements applicable to their respective scopes of work, however aligned with the broader Project level ESMS which will further be cascaded to third-party sub-contractors (as applicable).

The FM Co. will be responsible for the environmental and social performance of the non-clinical operations and maintenance activities under its control. Its responsibilities include:

- Establishing, implementing, and maintaining relevant elements of the Project ESMS under the SPV-Project Company's E&S Policy and broader ESMS manual/framework and applicable E&S requirements;
- Developing and implementing procedures for facilities management, maintenance, utilities, energy and water use, non-clinical, waste & wastewater, hazardous materials, pest control, fire and life safety, emergency preparedness, and occupational health and safety;
- Maintaining the Hospital's buildings, equipment, utilities, and non-clinical systems in accordance with applicable legal, permit, manufacturer, and Project requirements;
- Managing risks associated with non-clinical staff workers, service providers, visitors, contractors, and members of the public using the facility;
- Managing any operational sub-contractors, for example: cleaning, security, catering, laundry, transport, non-clinical waste collection, pest control, laboratory support, and other outsourced services within its scope;
- Ensuring that clinical wastes and other potentially hazardous waste streams are managed in coordination with the MoH and in accordance with applicable requirements, while preserving the MoH's responsibility for clinical waste generated through clinical activities;

- Implementing emergency preparedness and response procedures for events within its control, including fire, utility failure, chemical release, flood, severe weather, security events, and other facility emergencies;
- Coordination with the MoH on emergency response arrangements where an event may affect clinical operations or patient safety;
- Implementation of a workers grievance mechanism (for FM Co. and sub-contractor staff) and ensuring that complaints are recorded, investigated, and addressed in line with the project SEP and with communication of all grievances to the SPV-Project Company for tracking in the projects master GRM tracker;
- Reporting incidents, complaints, non-compliances, and performance indicators to the SPV-Project Company;
- Undertaking routine inspections, monitoring, audits, training, and ensuring resulting corrective actions are tracked and documented; and
- Providing the SPV-Project Company with periodic operational E&S reports and supporting records.

The FM Co. shall not assume responsibility for clinical decisions, clinical staffing, healthcare service delivery, clinical waste, or patient data management.

The ESMS responsibilities for the FM Co. will be cascaded to both the Hard FM and the Soft FM teams.

#### **Hard FM Team**

Main scope is to keep assets and systems reliable pertaining to,

- Asset and building fabric,
- MEP Systems (HVAC, Water, Medical Gases, etc),
- BMS & CAFM (Monitoring, Control & Data Integrity),
- Statutory Compliance,
- Help Desk Services.

#### **Soft FM Team**

Main scope is to create a safe, clean and comfortable environment pertaining to,

- Cleaning Services
- Waste Management
- Landscaping & Grounds
- Pest Control
- Hospitality Support
- Laundry Services
- Catering Support

The project parties will establish appropriate coordination mechanisms to support interface management with the SPV-Project Company, during both construction and operation, and the MoH; during the operational phase. Such mechanisms may include periodic meetings, information exchange protocols, reporting lines, issue escalation procedures, and agreed actions to address material environmental and social risks. These mechanisms will be designed to preserve the separate responsibilities of the parties while enabling practical cooperation on matters requiring joint attention.

### 3 Policies

As the Private Partner and overall accountable party, the Project's E&S, OH&S and HR policies will be held at the SPV-Project Company level. The policies will apply to all Project parties and their related activities falling under the ESMS scope (outlined above), including, but not limited to the main contractors (EPC Contractor and FM Co.) as well as their sub-contractors and key suppliers.

The Project's E&S Policies will be prepared prior to construction in which clear statements that define Project specific policies, commitments and related objectives with regard to E&S issues/compliance and management will be defined. The Project E&S policies will be signed by top management & displayed at prominent site locations; easily visible and accessible by Project workforce, including communication to workers during induction training and issued to all contractors engaged on the Project.

The SPV-Project Company's ESMS (and the MoH's separate operational policies) shall function as complementary systems within the coordinated PPP arrangement. The SPV-Project Company shall be responsible for those requirements within its contractual and operational control, while the MoH shall be responsible for matters within its statutory and operational remit. Each party shall implement its own policies and procedures for its respective activities. In the event the MoH's clinical operations may create Project related E&S risks, the SPV-Project Company shall, on a best-efforts basis and through the agreed governance mechanism, communicate applicable lender requirements and recommend practical mitigation measures for MoH consideration.

#### 3.1 E&S Policy

The SPV-Project Company will develop a project specific E&S Policy to lead the ESMS. The E&S Policy will includes commitments to:

- Comply with relevant E&S, legal, contractual, financing requirements and obligations. Including applicable international treaties and protocols, national legislation, permitting conditions and lenders requirements;
- Implement a risk-based ESMS that aligns with good international practices and conforms with the applicable E&S Standards (as a minimum);
- Implement measures to manage and reduce natural resource consumption, whilst implementing specified management measures to prevent pollution that are consistent with assessment documentation, permitting and lenders requirements;
- Engage with employees and stakeholders on E&S issues and implement a robust Grievance Redress Mechanism process for Project staff and third-party stakeholders;
- Uphold, respect, protect and fulfil human rights in accordance with the International Bill of Human Rights and any other instruments of international human rights such as those relating to the rights of women and children;
- Employ staff on the basis of equal opportunities and non-discrimination, whilst adhering to the ILO Conventions stated in IFC PS2 for worker management;
- Ensure staff receive E&S information, training and instructions on E&S leadership applicable to their activities and duties;
- Not accept or tolerate GBVH/SEA/SH in any form;
- Establish processes to identify, investigate and remedy instances of GBVH/SEA/SH. whilst encouraging reporting of such instances, providing support to those involved and ensuring their dignity, respect and confidentiality;

- Set indicators to promote and assure E&S performance of key supply chains and service providers;
- Implement systematic feedback systems to monitor, audit and report on E&S management and performance; and
- Annually review the E&S policy statement and set performance and management targets to enable continual improvement within the ESMS to be achieved.

### **3.1.1 Contracted Parties E&S Policies**

The EPC Contractor, FM Co. and sub-contractors may possess their own corporate E&S Policy, however this will not relieve these parties from complying with the requirements under the SPV-Project Company's E&S policy that will be cascaded to them.

## **3.2 OHS Policy**

The SPV-Project Company will develop a project Occupational Health and Safety (OHS) Policy applicable to all project staff employees under its direct control, and its contractors and sub-contractors engaged on the Project to the extent provided in their contracts.

The OHS Policy will commit the Project Company to:

- Providing and maintaining a safe and healthy working environment;
- Identifying hazards and assessing OHS risks before and during work activities;
- Applying the hierarchy of controls, prioritising elimination, substitution, engineering controls, administrative controls, and personal protective equipment;
- Preventing occupational injuries, illness, and work-related incidents;
- Providing appropriate information, instruction, training, supervision, and personal protective equipment;
- Ensuring that workers may report unsafe conditions and exercise stop-work rights without retaliation;
- Maintaining emergency preparedness and response arrangements;
- Investigating incidents and implementing corrective and preventive actions;
- Monitoring OHS performance and reviewing the effectiveness of controls; and
- Addressing physical, chemical, biological, ergonomic, psychosocial, traffic, fire, electrical, construction, and other hazards relevant to the Project.

These commitments reflect the requirement that workers be provided with a safe and healthy work environment and that risks be managed by minimising the causes of hazards so far as reasonably practicable.

### **3.2.1 Contracted Parties OHS Policy**

The EPC Contractor, FM Co. and sub-contractors may possess their own corporate OHS Policy, however this will not relieve these parties from complying with the requirements under the SPV-Project Company's OHS policy that will be cascaded to them.

## **3.3 HR Policy**

The SPV-Project Company prepare and implement a project specific Human Resources (HR) Policy appropriate to size, workforce, activities and parties involved in the Project. The

policy will establish the approach to managing its direct workers and through contractual controls, workers engaged by its contractors.

The HR Policy will include commitments to:

- Comply with applicable Uzbek labour, employment requirements, as well as lenders labour related requirements;
- Provide workers with clear information on terms and conditions of employment;
- Promote fair treatment, non-discrimination, and equal opportunity;
- Prohibit child labour, forced labour, trafficking, and retaliation;
- Respect lawful worker representation and freedom of association, where applicable;
- Provide fair and transparent recruitment, remuneration, working hours, leave, benefits, performance management, and termination procedures;
- Protect workers from harassment, bullying, exploitation, and gender-based violence;
- Provide reasonable accommodation for persons with disabilities where appropriate;
- Establish worker grievance mechanisms that are accessible, confidential where necessary, and free from retaliation.
- Protect worker health, safety, dignity, and welfare.
- Manage retrenchment and organisational change responsibly.
- Maintain appropriate worker records and protect personal information.

### **3.3.1 Contracted Parties HR Policy**

The EPC Contractor, FM Co. and sub-contractors may possess their own corporate HR Policy, however this will not relieve these parties from complying with the requirements under the SPV-Project Company's HR policy that will be cascaded to them.

## 4 Identification of Legal and Compliance Obligations

### 4.1 Identification of Legal Requirements

During the development of the ESMS, the applicable environmental and social legal requirements should be identified and documented, including:

- Applicable Uzbekistan Environmental and Social Regulation and Standards; and
- Applicable International Treaties and Conventions signed and/or ratified by Uzbekistan.

Please refer to **Appendix A** for the applicable legal framework including national requirements.

### 4.2 Identification of ESIA Requirements

This ESMS will be informed by Volume 2 of the ESIA which has developed Project and/or site-specific mitigation, management & monitoring measures that must be incorporated into the respective construction and operational phases of the Project.

Section 6 of this report comprehensively presents the mitigation and monitoring measures from the ESIA.

### 4.3 Identification of Requirements from the Competent Authority

The 'outcomes' (or other conditional requirements) issued by the NCECC to the Project's National EIA must be reviewed to ensure that all construction (from the Stage 1 positive conclusions) and later for the operational phase (EIA stage 3) related conditions established are managed accordingly.

Non-compliance with the conclusions may result in a breach of legislation and permitting requirements. The conclusions shall be maintained as part of the ESMS.

### 4.4 Identification of Requirements from the Project Lenders

#### 4.4.1 Lenders E&S Standards

As outlined above, the Project's sponsors are seeking project finance from Development Financial Institutions (DFIs) who have their own bespoke E&S policies/standards that relate to their investments, including Project finance transactions. Compliance with these requirements will be conditional of the financing.

Please refer to **Appendix A** for the applicable legal framework including lenders requirements.

#### 4.4.2 Environmental and Social Action Plan (ESAP)

Following the E&S due diligence process, the lenders (and their advisors) will establish an E&S 'Action Plan' (ESAP) that identifies E&S requirements for the Project commensurate with or supplementary to the ESIA. Requirements of the action plan will be the E&S covenant of the Project's loan agreement.

During the development of the Project's ESMS the ESAP for the Project must be reviewed to ensure that all related conditions are included for compliance management. It is highlighted that non-compliance with the lenders' requirements could impact financial disbursement and other factors.

## 5 Identification of Risks, Impacts & Opportunities

One of the principal stages in the development of the Project's ESMS will be the development of a Project specific aspects/risks register linking to potential environmental or social risks/impacts associated with the relevant activities being undertaken at that phase of the Project.

Once E&S aspects and associated risks have been identified and documented (i.e. specifically in accordance with the required construction methods statements or operational activities), associated controls should be developed that are commensurate to the level of anticipated severity, likelihood and any statutory or lender requirements.

The identification of risks and impacts is expected to align with the items identified in the ESIA but may include additional items that were unforeseen or related to specific working methods; which may vary from the understanding at the time of ESIA preparation.

Hence, when the applicable project teams are identifying the aspects/risks and associated environmental or social impacts the following will be taken into account:

- Risks, impacts and opportunities linked to the Project activities;
- Change, including planned or new development and or new/modified activities;
- Abnormal conditions and reasonably foreseeable emergency situations;
- Project timescales and potential impacts associated with seasonality;
- Stakeholder perception;
- Compliance obligations;
- Risks inherent in the supply chain in addition to those on-site; and
- Linkages with the Project's Health and Safety Management System.

The identification of aspects/risks and impacts will be documented, linked to associated proposed controls and updated as and when Project or E&S circumstances change.

## 6 Mitigation & Monitoring Requirements

Mitigation measures are a key component of E&S management and are designed to minimise, avoid, or offset potential negative environmental and social impacts arising from the Project's activities.

The measures are detailed in the ESIA Volume 2, following the assessment of potential project impacts and will require implementation in practice by the Project parties responsible for construction and operations respectively.

Monitoring is required during construction and operation to evaluate the effectiveness of the adopted mitigation approaches and to monitor whether the project is in compliance with the applicable national regulations/standards and applicable lenders E&S requirements.

## 6.1 Construction Phase Mitigation and Monitoring

### 6.1.1 Air Quality

| POTENTIAL IMPACTS | RECEPTOR                              | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | MONITORING                                                                           | RESPONSIBILITY |
|-------------------|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|----------------|
| Dust Emissions    | Construction Workers                  | <ul style="list-style-type: none"> <li>Keep construction worksite and roads clean and tidy and free from loose/friable materials.</li> <li>Where practical, compact the ground in areas that are heavily used by vehicles and machinery.</li> <li>Limit or suspend earthworks during extreme weather conditions (e.g. strong winds).</li> <li>Implement dust control facilities (e.g. windbreaks, temporary barriers, netting screens, fences or plastic sheets) to contain dust emissions from earthworks and stockpiled soil.</li> <li>Water spraying of open or unpaved ground areas such as temporary facilities areas and access roads around the site, will be done as frequent as necessary to minimize dust generation. Only non-potable water will be used for such activities</li> <li>All vehicles within construction areas onsite shall adhere to a speed limit of: (i) 30km/h at the main access road; (ii) 20 km/h within the project area; and (iii) 10km/h within working areas. Appropriate speed limit signage shall be provided at such construction areas.</li> <li>Ensure periodic washing of vehicles in order to remove any dusty material in a dedicated area.</li> <li>All trucks transporting aggregates, debris, and fine materials must be appropriately covered at all times through the use of tarpaulin or equivalent.</li> </ul> | <ul style="list-style-type: none"> <li>Upon receipt of complaints, if any</li> </ul> | EPC Contractor |
|                   | Nearby Residential Community (>500 m) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                      |                |

| POTENTIAL IMPACTS | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | MONITORING | RESPONSIBILITY |
|-------------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                   |          | <ul style="list-style-type: none"> <li>• Proper management of stockpiles and excavated material through appropriate enclosures and covers. This entails that it is of appropriate size to ensure entire coverage of the stockpile/excavated material, durable, able to withstand exposure to weather conditions (heat, rain, and strong winds in particular).</li> <li>• Adequate supplies of disposable dust masks shall be provided. Workers shall use them during strong winds or when conditions of worksite and work activities (e.g. earthworks) require their use (such conditions will be determined and identified by the EPC Contractor E&amp;S Manager).</li> <li>• Doors and windows of portable offices shall be kept sealed or closed to minimize if not totally prevent dust accumulation indoors.</li> <li>• Arrange site layout in a way that machineries and dust causing activities are located as far as possible from offices.</li> <li>• Visual dust monitoring will be undertaken daily and documented in the Internal Visual Dust Register.</li> <li>• Upon receipt of justifiable complaints, an air quality and dust monitoring program would be undertaken. Monitoring would be undertaken through a certified and approved third-party entity. Monitoring reports would be maintained onsite. Results will be compared against allowable national limits as well as limits included within the IFC General EHS Guidelines and the applicable EC Directive.</li> </ul> |            |                |

| POTENTIAL IMPACTS                              | RECEPTOR                              | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | MONITORING                                                                                                                                                                                                                                                                                                            | RESPONSIBILITY |
|------------------------------------------------|---------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Gaseous Emissions                              | Construction Workers                  | <ul style="list-style-type: none"> <li>Ensure that generators are located in an appropriate area as far as possible from on-site offices and residential areas.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <ul style="list-style-type: none"> <li>Pre-site authorisation checks on vehicle status and health, including associated emissions.</li> <li>Visual assessment of emissions (e.g. black smoke) to be undertaken on a daily basis while vehicles and equipment are in use and annual inspection of vehicles.</li> </ul> | EPC Contractor |
|                                                | Nearby Residential Community (>500 m) | <ul style="list-style-type: none"> <li>Ensure that all vehicles and trucks utilized onsite are properly licensed for operation with relevant authorities.</li> <li>Develop a regular inspection and scheduled maintenance program for vehicles, machinery, and equipment to be used throughout the construction phase for early detection of issues and to avoid unnecessary pollutant emissions. Smoke belching equipment shall be taken out of service for appropriate repair and will be prohibited for entering the site if not properly serviced.</li> <li>Turn off any equipment, machine or vehicle not in use.</li> </ul>                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                       |                |
| Volatile Organic Compounds and Odour Emissions | Construction Workers                  | <ul style="list-style-type: none"> <li>Hazardous materials stored and used on site with potential gas emissions (e.g. Volatile Organic Compounds) will be located in well-ventilated, but secure low-risk areas, away from major transport routes and away from the site boundary (where possible).</li> <li>Volatile fuels and chemicals (including hazardous wastes) will be stored in sealed containers. On site storage of large quantities of volatile fuels will be avoided, equally prolonged exposure to direct sun and heat will be avoided.</li> <li>Fires and material burning will not be allowed on the Project site.</li> <li>Chemical storage areas will be purpose built and well maintained. A data log of all chemicals with MSDSs will be provided at the storage facility within easy access.</li> </ul> | <ul style="list-style-type: none"> <li>Daily visual and olfactory observations of Sanitary Facilities &amp; Hazardous Material Storage Areas – as part of maintenance and inspection checks (for hygiene, safety and appropriate storage/containment).</li> </ul>                                                     | EPC Contractor |

| POTENTIAL IMPACTS | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | MONITORING | RESPONSIBILITY |
|-------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                   |          | <ul style="list-style-type: none"> <li>Adequate and sufficient sanitary facilities for site workers will be provided.</li> <li>Effective cleaning and maintenance of toilets to be undertaken to avoid odour dispersion and cleaning records/inspection sheets displayed in the toilets.</li> <li>All septic tanks must be sealed and fully functioning.</li> <li>Septic tanks must be operated and maintained according to manufacturer recommendations.</li> <li>Sanitary waste will be removed from site by licensed contractors and disposed in wastewater treatment facilities approved by the applicable regulator.</li> </ul> |            |                |

### 6.1.2 Climate Change

| POTENTIAL IMPACTS          | RECEPTOR          | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | MONITORING | RESPONSIBILITY |
|----------------------------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
| Increase in GHGs emissions | Global Atmosphere | <ul style="list-style-type: none"> <li>Manage energy and fuel demand through use of energy efficient equipment, monitoring fuel and electricity consumption and training the workforce on possible consumption reduction practices.</li> <li>Monitor weather forecasts and be prepared to suspend work during a heat wave or severe sand/dust storm events.</li> <li>Implement strict heat stress management procedure, including mandatory work-rest cycles, provision of shaded rest areas, and adequate hydration.</li> <li>Schedule strenuous activities during cooler parts of the day.</li> </ul> | -          | EPC Contractor |

| POTENTIAL IMPACTS | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | MONITORING | RESPONSIBILITY |
|-------------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                   |          | <ul style="list-style-type: none"> <li>• Provide training and awareness on heat-related health risks.</li> <li>• Provide workers with appropriate PPE</li> <li>• Implement dust suppression measures (e.g., water spraying) on exposed soil and construction areas.</li> <li>• Protect sensitive equipment and materials with covers or storage in enclosed areas in the event of sand/dust storms.</li> <li>• Implement an emergency evacuation plan and conduct regular drills.</li> <li>• The EPC contractor will complete a risk assessment of extreme weather events (extreme heat, dust storms etc.) on workers and implement the necessary mitigation.</li> <li>• Provide access to medical facilities and first-aid equipment on-site.</li> <li>• Secure water supply agreements with water supply facilities and maintain contingency plans for sourcing additional water if needed.</li> <li>• Promote water conservation measures on-site (recycling water, minimising wastewater).</li> <li>• Use alternative dust suppression techniques that reduce water use (compaction, covering stockpiles etc.), where possible</li> </ul> |            |                |

### 6.1.3 Noise and Vibration

| POTENTIAL IMPACTS       | RECEPTOR                     | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | MONITORING                                                                       | RESPONSIBILITY |
|-------------------------|------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|----------------|
| Construction Site Noise | Construction Workers         | <ul style="list-style-type: none"> <li>If construction activities are to take place outside day-time working hours, relevant permits and authorisation from local authorities will be required and notification shall be posted in regard to potential for specific noisy activities to the nearby residential and commercial community.</li> <li>Where possible, the highest noise emitting activities should be undertaken in a central site area and away from boundaries.</li> <li>In case of potential cumulative noise impacts arising, nearby residential and commercial community will be given prior notice about cumulative construction activities that could generate noise.</li> <li>Limit machinery and vehicle movements to defined work area and designated access and roads.</li> <li>Limit the number of generators that are operating at the same time.</li> <li>Select construction equipment based on GIIP.</li> <li>Locate fixed and mobile plants (e.g. generators) with consideration of nearby sensitive receptors.</li> <li>Select and use the quietest machinery and equipment that can economically undertake the work wherever possible.</li> <li>Operators of construction machinery and equipment will be informed of the potential noise problems and of techniques to minimize noise emission through a continuous process of training and inspection.</li> </ul> | Noise monitoring during daytime and nighttime (if nighttime works are conducted) | EPC Contractor |
|                         | Nearby residential Community |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                  |                |

| POTENTIAL IMPACTS | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | MONITORING | RESPONSIBILITY |
|-------------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                   |          | <ul style="list-style-type: none"> <li>• Use well-maintained mufflers and noise suppressants for high noise generating equipment and machinery where applicable, such as compressors, electric motors, machines, etc.</li> <li>• Develop a regular inspection and scheduled maintenance program for vehicles, machinery, and equipment to be used throughout the construction phase for early detection of issue to avoid unnecessary elevated noise levels. Upon detecting any vehicle or machinery that emits unacceptable amount of noise will be ordered for removal from work until it is repaired.</li> <li>• Turn off any equipment, machine or vehicle not in use.</li> <li>• Ensure that all vehicles and machinery used through the execution of the project are properly licensed.</li> <li>• In the event of a noise complaint noise monitoring will be carried out at the relevant receptor, by an approved third-party entity. Monitors shall be located approximately 1.5m above the ground and no closer than 3m to any reflecting surface (e.g. wall). Monitoring reports will be maintained onsite.</li> <li>• In areas where noise levels may exceed 80 Decibels (dB) (e.g. excavation and grinding activities and/or workers exposed to excessive noise generating equipment and machinery), noise monitoring shall be undertaken for at least 10 mins during peak activities. If 80 dB (LAeq) is exceeded, appropriate hearing protection shall be provided to all workers, this will be based on noise levels and location but can include ear plugs, semi-insert ear plugs, ear protection or earmuffs. It must be ensured that such hearing protection is worn</li> </ul> |            |                |

| POTENTIAL IMPACTS | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | MONITORING | RESPONSIBILITY |
|-------------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                   |          | <p>by all affected personnel at all times. Ear plugs or earmuff shall have a Noise Reduction Rating (NRR) of at least 20 to 30 Decibels. Results will be compared against allowable national limits as well as limits included within the IFC General EHS Guidelines.</p> <ul style="list-style-type: none"> <li>Safety signs must be installed in areas where noise is expected to be greater than 80 dB to require the use of appropriate Personal Protective Equipment (PPE) (i.e. hearing protection).</li> </ul> |            |                |

#### 6.1.4 Terrestrial Ecology

| POTENTIAL IMPACTS           | RECEPTOR              | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                       | MONITORING                                                                                                                                                                               | RESPONSIBILITY                                                                                                                                                                                                         |
|-----------------------------|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Habitat and vegetation loss | Flora and Fauna       | <ul style="list-style-type: none"> <li>Clearance and construction activities shall be restricted to the minimum area required for construction, and unnecessary disturbance outside the approved construction footprint shall be prohibited.</li> <li>Construction boundaries, material storage areas, and access routes shall be clearly demarcated to prevent inadvertent encroachment into adjacent areas.</li> </ul> | <ul style="list-style-type: none"> <li>On-going visual observations and documentation through videos and photographs of live fauna at the commencement of working activities;</li> </ul> | EPC Contractor EHS Officer to implement monitoring and fauna protection measures; Qualified Ecologist to undertake pre-construction surveys and any required rescue/relocation; Project Company to oversee compliance. |
| Disturbance to fauna        | Ground-dwelling fauna | <ul style="list-style-type: none"> <li>Pre-construction inspections shall be undertaken in areas scheduled for earthworks to identify the presence of any fauna, including IUCN or nationally red-listed/protected species of mammals, birds or herpetofauna, that may be affected by construction</li> </ul>                                                                                                            | <ul style="list-style-type: none"> <li>Pre-construction survey before site excavation and relocation/rescue, if needed.</li> </ul>                                                       |                                                                                                                                                                                                                        |

| POTENTIAL IMPACTS            | RECEPTOR              | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | MONITORING                                                                                        | RESPONSIBILITY |
|------------------------------|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|----------------|
|                              |                       | <p>activities. Such surveys are required to be undertaken by a trained ecologist.</p> <ul style="list-style-type: none"> <li>Pre-construction inspections of the footprint areas shall be undertaken to identify any terrestrial fauna and the methods for their management. A Biodiversity Chance Finds Procedure will be followed in case of any encounters of fauna.</li> <li>All construction workers shall receive an induction training covering wildlife protection requirements, reporting procedures, and the Biodiversity Chance Finds Procedure.</li> <li>Construction personnel shall be instructed not to capture, harass, injure, or intentionally disturb wildlife encountered within or around the Project site.</li> <li>Construction activities shall be confined to work areas to minimize disturbance to adjacent habitats.</li> <li>Hunting, trapping, or intentional harm to wildlife by site personnel shall be strictly prohibited.</li> </ul> | <ul style="list-style-type: none"> <li>Weekly site inspections throughout construction</li> </ul> |                |
| Mortality or Injury to Fauna | Ground-dwelling fauna | <ul style="list-style-type: none"> <li>Pre-construction inspections of the footprint areas shall be undertaken to identify any terrestrial fauna, specifically the reptile species. A Chance Find Procedure will be followed in case of any encounters of fauna.</li> <li>Open excavations, trenches or pits shall be inspected daily prior to commencement of work to identify and safely remove any trapped fauna.</li> <li>Vehicle movements shall be restricted to designated access routes wherever practicable.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                   |                |

| POTENTIAL IMPACTS | RECEPTOR     | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | MONITORING | RESPONSIBILITY |
|-------------------|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                   |              | <ul style="list-style-type: none"> <li>A 25 km/hr speed limit to be imposed across the construction site in order to minimize risk of direct mortality of fauna.</li> <li>Any fauna mortality or injury observed on site, including incidents involving construction vehicles, shall be recorded and formally reported by the site team on the day of occurrence.</li> <li>Any wildlife injury or mortality observed during construction, including incidents involving vehicles or machinery, shall be documented, investigated, and reported to the Environmental Manager.</li> </ul>                                                                                                                                                                                                                                                                                                                                         |            |                |
| Invasive Species  | Native flora | <ul style="list-style-type: none"> <li>Soil, filling material or landscaping materials, if any, imported to the site shall be obtained from approved sources free from known invasive plant species.</li> <li>Appropriate training shall be provided to the EPC Contractor personnel to enable the identification, reporting of likely invasive alien plant species that may establish within the Project area.</li> <li>Disturbed areas within the Project site and immediate vicinity shall be regularly inspected for the establishment of invasive or opportunistic plant species during construction.</li> <li>Any invasive species identified within the Project site shall be removed and managed in accordance with good practices.</li> <li>The above prevention, inspection, early-detection, reporting, control and follow-up monitoring requirements shall be incorporated into the CESMP and the OESMP.</li> </ul> |            |                |

### 6.1.5 Water Resources

| POTENTIAL IMPACTS           | RECEPTOR    | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | MONITORING                                                                                                                                                                                                     | RESPONSIBILITY |
|-----------------------------|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Accidental Spills and Leaks | Groundwater | <ul style="list-style-type: none"> <li>Ensure proper PPE is worn; to include at a minimum: gloves, safety shoes, and safety goggles</li> <li>Prompt and effective action be initiated to stop the spillage/leakage and its pollution at source.</li> <li>Contain the spillage and prevent it from reaching sensitive areas by using the absorbent materials in the available spill kit</li> <li>After the spillage or leakage has been contained, the contaminated material and the absorbent material should be placed within the disposal bags available in the spill kit and properly enclosed with tape or twist ties. Disposal bag shall be removed and treated as hazardous waste.</li> <li>Make sure that the used spill kits are replaced with new ones and that enough absorbing materials are available for future potential environmental accidents.</li> <li>Hazardous materials and wastes should be stored in accordance with GIIP, namely impermeable flooring, bunds, shade, etc. to ensure that leaks to the soil and groundwater do not occur.</li> <li>Provide concrete bunding (or other suitable impervious barrier) for fuel storage and transfer on site. The bunding should be bigger than the fuel storage tank/s to allow a bit of working space around tank/s (e.g. 20% bigger than the tank/s). Use of sheeting to prevent soil contamination (e.g. during vehicle servicing).</li> </ul> | <ul style="list-style-type: none"> <li>Daily during construction as part of the daily walkdown to check for visible spills &amp; leaks of hydrocarbons and other potentially hazardous or chemicals</li> </ul> | EPC Contractor |

| POTENTIAL IMPACTS | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | MONITORING | RESPONSIBILITY |
|-------------------|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                   |          | <ul style="list-style-type: none"> <li>Concrete slabs or other suitable impervious layer should be installed at each point where hazardous materials are handled.</li> <li>The fuel tanks should stand on a concrete slab or other suitable surface to prevent the leakage of contaminants into the soil.</li> <li>All vehicles and machinery should be fitted with oil drip trays to prevent oil dripping to the ground.</li> <li>The EPC Contractor will maintain an inventory of all potentially hazardous materials and chemicals used and stored on-sites and maintain Material Safety Data Sheets (MSDS) at point of material storage.</li> <li>Store all chemicals/materials according to manufacturer's instructions and MSDS. This includes consideration/assessment of compatibility with other substances.</li> <li>The chemical storage areas will have effective ventilation and be sheltered from rain/sun. Segregated storage areas will be provided to allow for separation of any incompatible chemicals.</li> <li>All mobile equipment using oils or fuels will have drip trays underneath to capture any oil leaks or drips.</li> <li>The Contractor will develop and implement an Emergency Response Plan (ERP) and Spill Response and Contingency.</li> <li>Relevant personnel to be trained on emergency and spill response, containment, material handling and storage procedures.</li> </ul> |            |                |

| POTENTIAL IMPACTS | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | MONITORING | RESPONSIBILITY |
|-------------------|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                   |          | <ul style="list-style-type: none"> <li>All spills and leaks will be reported promptly to the Construction Manager and investigated to confirm the cause and put in place appropriate corrective/preventative actions. The spill or leaks incidents will be documented with evidence of investigation and close out.</li> <li>No vehicle or machinery maintenance or repair will be carried out on sites.</li> <li>Refuelling and maintenance of vehicles/equipment will be within a dedicated and approved area, on impermeable surface and with drip trays and spill clean-up materials.</li> <li>Any fuel transport vehicles and its equipment to be maintained and routinely inspected to ensure the tank, pumps, pipe work and the vehicle itself are free from leaks and fit for purpose-No equipment will be placed in service until deficiencies are corrected.</li> <li>Emergency drills will be held with staff to practice timely and effective spill response.</li> <li>Implement regular maintenance program of vehicles and equipment to minimise leaks or mechanical failures and keep document evidence.</li> <li>Washing equipment, machinery and vehicles will only be permitted in designated areas, with impermeable surfaces and dedicated drainage systems.</li> <li>Washout of concrete trucks will be performed in designated areas only at approved concrete washout areas.</li> </ul> |            |                |

| POTENTIAL IMPACTS | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | MONITORING | RESPONSIBILITY |
|-------------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                   |          | <ul style="list-style-type: none"> <li>Implementation of good housekeeping practices during construction activities including procedures and requirements for proper handling, storage, and transport of hazardous materials and waste.</li> <li>Wastewater storage tanks shall be installed above ground for visual inspection within bunding of 110% the capacity of the wastewater tank.</li> <li>Wastewater storage tanks will be regularly inspected and will be equipped with a level gauge to monitor any leaks and ensure the tanks are emptied to avoid over-flowing.</li> </ul> |            |                |

### 6.1.6 Topography, Geology, and Soil

| POTENTIAL IMPACTS                                                  | RECEPTOR     | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | MONITORING                                                                                                                                                                                                                                                    | RESPONSIBILITY |
|--------------------------------------------------------------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Cross contamination of soil and exposure risks during construction | Soil Quality | <ul style="list-style-type: none"> <li>Limit the exposed area and duration of open excavations to reduce the potential mobilisation of contaminated soils and minimise dust generation.</li> <li>Ensure all site personnel involved in excavation and soil handling are provided with and use appropriate (PPE), supported by training on soil-related health and safety risks, including the identification of potentially contaminated soils.</li> <li>Conduct visual inspections and periodic monitoring of excavated and imported soils during construction to</li> </ul> | <ul style="list-style-type: none"> <li>Weekly inspections to check for visible spills &amp; leaks of hydrocarbons and other potentially hazardous or chemicals</li> <li>Records of spill response drills and training provided to workers handling</li> </ul> | EPC Contractor |
|                                                                    | Site workers |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                               |                |

| POTENTIAL IMPACTS                                                                                                                    | RECEPTOR     | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | MONITORING                                 | RESPONSIBILITY |
|--------------------------------------------------------------------------------------------------------------------------------------|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|----------------|
|                                                                                                                                      |              | identify any unexpected contamination and trigger corrective actions if required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | hazardous material, waste, and wastewater. |                |
| Contamination of soil and groundwater due to accidental spills, leakages, and uncontrolled disposal of chemical products and wastes. | Soil quality | <ul style="list-style-type: none"> <li>Washing of equipment, machinery and vehicles will only be permitted in designated areas, with impermeable surfaces and dedicated drainage systems that lead to separate sumps or, treatment facilities and/or lined evaporation ponds.</li> <li>Concrete washout areas will be located away from storm drainage &amp; canals and will be designed with adequate holding capacity. The wastewater will be contained within the designated impervious bund.</li> <li>Washout of concrete trucks will be performed in designated areas only at the batching plant or any other approved concrete washout areas at the site.</li> <li>Storage of all hazardous materials such as fuels and chemicals on an impermeable base with liners and/or secondary containment bund with enough capacity to hold 110% of the bulk storage container and 25% of the total volume of the multiple containers.</li> <li>Store all chemicals/materials according to manufacturer's instructions and Material Safety Data Sheet (MSDS).</li> <li>The chemical storage area will have proper ventilation and cover from the elements (i.e. rain, snow, sun) and different storage areas to allow for segregation of incompatible chemicals.</li> <li>All equipment using oils will have drip trays underneath to capture any oil leaks or drips.</li> </ul> |                                            |                |

| POTENTIAL IMPACTS | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | MONITORING | RESPONSIBILITY |
|-------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                   |          | <ul style="list-style-type: none"> <li>Contractor will develop and implement an Emergency Response Plan (ERP) and Spill Response and Contingency.</li> <li>Maintain an inventory of all potentially hazardous materials and chemicals used and stored on-site.</li> <li>All spills and leaks will be reported promptly to the Construction Manager and to be investigated to confirm the cause and put in place appropriate corrective/preventative actions.</li> <li>Spill kits shall be available at chemical storage areas and fully stocked with appropriate absorbent materials.</li> <li>Refuelling and maintenance of vehicles/equipment will be within a dedicated depot area at the site, on impermeable surface.</li> <li>Availability of suitable containment and spill clean-up materials/equipment at specific locations within the project site (e.g. where refuelling is to take place).</li> <li>Relevant personnel to be trained on emergency and spill response, containment, material handling and storage procedures.</li> <li>Regular emergency drills to practice timely and effective spill response.</li> <li>Fuel transport vehicles and equipment to be maintained and routinely inspected to ensure the tank, pumps, pipe work and the vehicle itself are free from leaks and fit for purpose-No equipment will be placed in service until deficiencies are corrected.</li> </ul> |            |                |

| POTENTIAL IMPACTS | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | MONITORING | RESPONSIBILITY |
|-------------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                   |          | <ul style="list-style-type: none"> <li>Implement regular maintenance program of vehicles and equipment to minimise leaks or mechanical failures and keep document evidence.</li> <li>The EPC Contractor will obtain relevant permits to store large quantities of hazardous materials such as diesel etc (where necessary) in accordance with Uzbek regulations.</li> <li>The implementation of the project CESMP and associated Waste Management Plan and Procedures will ensure that spills are kept to a minimum and are cleaned up quickly using spill kits located in risk areas.</li> <li>Develop and maintain a hazardous waste inventory to document and track and show chain of custody of hazardous wastes generated, and their disposal route.</li> <li>Implementation of good housekeeping practices during construction activities including procedures and requirements for proper handling, storage, and transport of hazardous materials and waste.</li> <li>The EPC Contractor and sub-contractors will provide induction training and Toolbox Talks (TBTs) relating to the management, transportation and handling of hazardous materials and wastes.</li> </ul> |            |                |

### 6.1.7 Solid Waste and Wastewater

| POTENTIAL IMPACTS | RECEPTOR             | MITIGATION AND MANAGEMENT MEASURES | MONITORING | RESPONSIBILITY |
|-------------------|----------------------|------------------------------------|------------|----------------|
|                   | Waste infrastructure |                                    |            | EPC Contractor |

| POTENTIAL IMPACTS                                                                      | RECEPTOR                | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | MONITORING                                                                                                                                                                                                                                                                                                                                                                          | RESPONSIBILITY |
|----------------------------------------------------------------------------------------|-------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Generation and improper management of non-hazardous domestic and municipal solid waste | within Fergana Region   | <ul style="list-style-type: none"> <li>The EPC Contractor will coordinate with relevant local authorities (e.g. municipalities) in the Fergana Region to identify licensed waste management facilities with adequate capacity to receive Project-related waste. Relevant utilities and communities will also be consulted to determine whether additional mitigation measures are required to prevent disruption to existing infrastructure and services.</li> <li>Prior to the commencement of construction, the EPC Contractor will confirm available capacity at designated landfills, recycling centres, hazardous waste facilities, and wastewater treatment plants, and will establish formal contracts specifying permitted waste types, forecast volumes, and delivery schedules to avoid overloading receiving facilities.</li> <li>A construction-phase Waste Management Plan (CWMP) will be prepared and implemented in accordance with GIIP.</li> <li>The Project will implement a staggered waste transport schedule aligned with construction phases to avoid large, short-term surges in waste delivery.</li> <li>The EPC Contractor will ensure that all waste consignments requiring off-site treatment and/or disposal will be transferred only to licensed waste management facilities allocated by relevant authorities.</li> <li>Material procurement and storage practices will be optimised to minimise off-cuts, spoilage, and packaging waste, including through accurate material take-offs and, where feasible, the use of modular construction techniques.</li> </ul> | <ul style="list-style-type: none"> <li>Number of grievances from waste management service providers and/ or affected communities and commercial/ industrial establishments with regards to disruption of waste management services</li> <li>Number of waste consignments exported out of the project area without regulatory permits.</li> <li>Volume of generated waste</li> </ul> |                |
|                                                                                        | Residential Communities |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                     |                |
|                                                                                        | Construction Workers    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                     |                |

| POTENTIAL IMPACTS | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | MONITORING | RESPONSIBILITY |
|-------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                   |          | <ul style="list-style-type: none"> <li>On-site reuse of inert construction materials, and suitable aggregates for backfilling and landscaping will be maximised, and dedicated segregation areas will be established to increase recovery rates of recyclable materials (e.g. metal, wood, plastics, and cardboard).</li> <li>Where excess soil is required to be disposed off-site, the EPC Contractor will consult with the licensed waste transportation and disposal companies in regard to the baseline soil content that had concentrations of copper, zinc and lead exceeding national MPC values for soil quality.</li> <li>Collection of waste to its final disposal location will be through the licensed waste collector. The licensed waste collector will be responsible for project waste management and act as a waste contractor and transport the waste to authorized recycling/recovery and /or final disposal facilities that are licensed according to national regulations.</li> <li>The EPC contractor will promote and implement a hierarchy of controls in managing wastes which include prevention, reuse, recycling, recovery and disposal in order of most preferred to least preferred option.</li> <li>Domestic solid wastes to be segregated and identified from the other waste streams into separate waste containers/skips clearly to facilitate recycling.</li> <li>Waste containers/skips will be clearly labelled and placed in designated waste storage locations. Labels will be waterproof, securely attached, and written in English and other languages as required.</li> </ul> |            |                |

| POTENTIAL IMPACTS                                     | RECEPTOR                                   | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | MONITORING | RESPONSIBILITY |
|-------------------------------------------------------|--------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                                                       |                                            | <ul style="list-style-type: none"> <li>Waste containers will have lids in order to mitigate wind dispersed waste.</li> <li>For litter (food waste, domestic waste), an adequate number of covered bins will be strategically placed throughout the site at locations where construction workers and staff consume food. These will be regularly collected and taken to the main waste storage area.</li> <li>Food waste will be stored within a sealed metal or plastic skip or bin to prevent pests from gaining access.</li> <li>Ongoing housekeeping training will be provided to all staff on the importance of the need to avoid littering.</li> </ul> |            |                |
| Generation and improper management of hazardous waste | Waste infrastructure within Fergana Region | <ul style="list-style-type: none"> <li>Hazardous waste collection will be determined on a case-by-case basis.</li> <li>For liquid hazardous wastes, all liquid bins and containers will be leak-proof and sealed. In addition, secondary containment will be implemented to prevent any hazardous liquid escaping – e.g. to soil/ground. Secondary containment must be provided with a capacity of 110% of the largest storage bin/container or 25% of the total storage capacity.</li> </ul>                                                                                                                                                               |            |                |
|                                                       | Residential Communities                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |            |                |
|                                                       | Construction Workers                       | <ul style="list-style-type: none"> <li>Implement spill response procedures and maintain spill kits at all waste and fuel storage areas.</li> <li>All Hazardous waste must be labelled and a waste manifest completed when arranging collection and safe disposal.</li> <li>All waste collection vehicles must be supplied with a spill kit.</li> </ul>                                                                                                                                                                                                                                                                                                      |            |                |

| POTENTIAL IMPACTS | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | MONITORING | RESPONSIBILITY |
|-------------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                   |          | <ul style="list-style-type: none"> <li>Develop and maintain a hazardous waste inventory to document and track hazardous wastes generated, segregated, reused and consignments.</li> <li>Segregate and identify hazardous waste from the other waste streams into separate signed and labelled waste containers/skips.</li> <li>Store hazardous waste in allocated impervious 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 &amp; spill response procedures. This area will be placed away from any sources of ignition.</li> <li>The hazardous waste storage area will be constructed away from the drainage system.</li> <li>Provide training and ready information on chemical compatibility to employees in order to ensure wastes are appropriately handled and stored.</li> <li>Only licensed waste transporters and waste management facilities will be engaged for wastes.</li> <li>Sanitary wastewater tanks to be properly maintained and inspected to ensure tanks do not overflow.</li> <li>Site inspections will be carried out regularly by the EPC contractor to ensure that all wastewater generated is properly managed, and no leakages or spill occur. In the event of a spill or overflow, immediate action will be taken per spill containment procedures and clean up procedures.</li> </ul> |            |                |

| POTENTIAL IMPACTS                                | RECEPTOR                                        | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | MONITORING | RESPONSIBILITY |
|--------------------------------------------------|-------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
| Generation and improper management of wastewater | Wastewater infrastructure within Fergana Region | <ul style="list-style-type: none"> <li>Establish designated concrete washout areas with impermeable containment; prohibit washout to ground or open drains.</li> <li>Avoid onsite vehicle washing activities.</li> <li>Prohibit discharge of fuel, oil, or chemical-contaminated water to any surface water or drainage system; manage under a dedicated Hazardous Materials Management Plan.</li> <li>Regular inspection of the wastewater septic tanks and ensure adequate tank emptying procedures are in place.</li> </ul> |            |                |
|                                                  | Residential Communities                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |            |                |
|                                                  | Construction Workers                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |            |                |

#### 6.1.8 Landscape and Visual

| POTENTIAL IMPACTS             | RECEPTOR              | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                           | MONITORING                                                                                                                                                                           | RESPONSIBILITY |
|-------------------------------|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Change in Landscape Character | Receiving Environment | <ul style="list-style-type: none"> <li>Construction activities will be limited to the areas required.</li> <li>Only designated access roads will be used.</li> <li>Good housekeeping will be implemented across the site.</li> <li>Lighting will be managed to avoid light spill.</li> </ul> | No monitoring is proposed for landscape and visual impacts, however, any grievances will be covered on a case-by-case basis, as received, through the Project E&S Management System. | EPC Contractor |
| Reduction in Visual Amenity   | Nearby Receptors      |                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                      |                |

### 6.1.9 Traffic and Transportation

| POTENTIAL IMPACTS                       | RECEPTOR   | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | MONITORING                                                                                                                                                                                                                                                                                                                                                                              | RESPONSIBILITY |
|-----------------------------------------|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Increased vehicular flow and congestion | Road users | <ul style="list-style-type: none"> <li>Prepare and implement a Construction Traffic Management Plan by the EPC Contractor, covering designated haul routes, delivery schedules, vehicle speeds, traffic control measures, and emergency access arrangements.</li> <li>Coordinate construction traffic with the relevant authorities, including the local traffic police and airport authorities (where applicable), and with other contractors/developments within the Fergana Eco City to minimise cumulative traffic impacts and avoid simultaneous peak construction traffic.</li> <li>Construction access roads to be clearly marked, with routes, parking, directions, speed limits, unloading area (amongst others).</li> <li>Minimise the number of construction road movements as much as practicable, i.e., maximize the capacity of vehicles - Buses should be used and carpooling should be encouraged.</li> <li>Schedule deliveries of oversized loads and heavy goods vehicles outside peak traffic periods, where practicable.</li> <li>Stagger deliveries to the site will ensure that congestion on local and site roads is minimised, whilst reducing waiting times for drivers and over demand on receiving staff at the site.</li> <li>Maintain unrestricted access for emergency vehicles, airport users, neighbouring developments, and local communities at all times.</li> </ul> | <ul style="list-style-type: none"> <li>On-going monitoring and following complaints of Traffic congestion and vehicle queuing</li> <li>Record and investigate road traffic incidents</li> <li>Monthly inspection of road conditions used by construction traffic.</li> <li>Community complaints relating to traffic, access and road safety through the grievance mechanism.</li> </ul> | EPC Contractor |
| Road Safety Incidents                   |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                         |                |

| POTENTIAL IMPACTS | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | MONITORING | RESPONSIBILITY |
|-------------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                   |          | <ul style="list-style-type: none"> <li>• Provide sufficient on-site parking and vehicle turning areas to prevent Project vehicles from queuing or parking on public roads.</li> <li>• Drivers to be fully competent and authorised to drive heavy loads vehicles and to receive specific training.</li> <li>• All site vehicles shall have audibled and visual warnings when reversing.</li> <li>• Off-road driving outside of dedicated roads and active work sites shall be prohibited.</li> <li>• Vehicle speeds on all non-public site access and internal site roads will be restricted to 30km/h.</li> <li>• Driving awareness to be provided to workforce.</li> <li>• Ensure escorts, flag persons and other safety measures are employed where necessary (e.g., entering and exiting the site).</li> <li>• All traffic incidents and near misses will be recorded and investigated with any necessary corrective actions taken including reporting to local police.</li> <li>• Prompt repair and maintenance works will be ensured to rectify any damages caused by construction traffic, in coordination with the relevant local authorities.</li> <li>• A grievance mechanism will be established to allow local communities to make complaints relating to Project traffic nuisance or drivers.</li> </ul> |            |                |

### 6.1.10 Archaeology and Cultural Heritage

| POTENTIAL IMPACTS          | RECEPTOR                 | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | MONITORING                                                                                                                                                         | RESPONSIBILITY |
|----------------------------|--------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Damage to buried artefacts | Archaeological artefacts | <ul style="list-style-type: none"> <li>Development of a chance find procedure to be used and followed by the construction workers and site engineers should an artefact be discovered during the excavation works.</li> <li>Any worker or staff member (from EPC Contractor, subcontractor, security personnel, or other) who encounters any archaeological or cultural resources during the construction phase or suspected remains will immediately notify the EPC Contractor E&amp;S Manager while taking immediate action to stop all construction activities within this area.</li> <li>The EPC Contractor E&amp;S Manager will notify the Company E&amp;S Manager immediately.</li> <li>The Company E&amp;S Manager and the EPC Contractor E&amp;S Manager will inspect the site and confirm whether the findings could potentially be an archaeological and cultural heritage site and/or a suspected site.</li> </ul> | <ul style="list-style-type: none"> <li>Percentage of construction workers who have received induction trainings in archaeological Chance Find Procedure</li> </ul> | EPC Contractor |

### 6.1.11 Socio-economic

| POTENTIAL IMPACTS                                                           | RECEPTOR                                              | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                              | MONITORING                                                                                                                                               | RESPONSIBILITY                                   |
|-----------------------------------------------------------------------------|-------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| Capital investment contributing to the national, regional and local economy | National economy, regional economy, local businesses, | <ul style="list-style-type: none"> <li>Procure goods and services from national, regional and local suppliers where feasible.</li> <li>Advertise procurement opportunities through transparent procurement processes.</li> <li>Encourage participation of local businesses and SMEs.</li> </ul> | <p>Monthly monitoring throughout the construction phase of:</p> <ul style="list-style-type: none"> <li>Number and % of local workers employed</li> </ul> | <p>SPV-Project Company</p> <p>EPC Contractor</p> |

| POTENTIAL IMPACTS                             | RECEPTOR                                                                                          | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                  | MONITORING                                                                                                                                                                                                                                                          | RESPONSIBILITY |
|-----------------------------------------------|---------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                                               | contractors and suppliers                                                                         | <ul style="list-style-type: none"> <li>Monitor local procurement performance throughout construction.</li> </ul>                                                                                                                                                                                                                                                                                                    | <ul style="list-style-type: none"> <li>Number and % of local businesses contracted</li> <li>Value of procurement awarded to local suppliers</li> </ul>                                                                                                              |                |
| Increased employment opportunities            | Local workforce, job seekers, contractors                                                         | <ul style="list-style-type: none"> <li>Establish and implement transparent and fair recruitment procedures.</li> <li>Prioritise local employment where suitably qualified candidates are available.</li> <li>Communicate employment opportunities, recruitment criteria and recruitment timeframes.</li> <li>Monitor workforce composition and local employment.</li> </ul>                                         |                                                                                                                                                                                                                                                                     |                |
| Workforce Influx                              | Neighbouring communities, workers, local service providers, Fergana City municipality (Hokimiyat) | <ul style="list-style-type: none"> <li>Establish and implement a Labour and Workforce Management Plan.</li> <li>Provide and manage temporary on-site worker accommodation.</li> <li>Implement phased workforce mobilisation and demobilisation.</li> <li>Engage with neighbouring communities on workforce-related activities.</li> <li>Develop and implement worker and community grievance mechanisms.</li> </ul> | <p>Monthly monitoring throughout the construction phase of:</p> <ul style="list-style-type: none"> <li>Total workforce numbers (local vs non-local)</li> <li>Occupancy of worker accommodation</li> <li>Number of workforce-related community complaints</li> </ul> | EPC Contractor |
| Increased community expectation and grievance | Neighbouring communities, job seekers, and local businesses                                       | <ul style="list-style-type: none"> <li>Develop and implement a Stakeholder Engagement Plan (SEP).</li> <li>Communicate recruitment processes, procurement opportunities and Project implementation schedules prior to construction activities.</li> </ul>                                                                                                                                                           | <p>Monthly monitoring throughout the construction phase of:</p> <ul style="list-style-type: none"> <li>Number of grievances received</li> </ul>                                                                                                                     | EPC Contractor |

| POTENTIAL IMPACTS                        | RECEPTOR                                             | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                               | MONITORING                                                                                                                                                                                                                                                                                                                    | RESPONSIBILITY |
|------------------------------------------|------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                                          |                                                      | <ul style="list-style-type: none"> <li>Manage community expectations through timely disclosure of Project information.</li> </ul>                                                                                                                                                                                                                                                                                                                                | <ul style="list-style-type: none"> <li>% of grievances resolved within the prescribed timeframe</li> <li>Average grievance resolution time</li> </ul>                                                                                                                                                                         |                |
| Increased antisocial behaviour           | Neighbouring communities, vulnerable groups, workers | <ul style="list-style-type: none"> <li>Establish, implement and enforce a Worker Code of Conduct.</li> <li>Provide worker induction and awareness training on appropriate behaviour, GBV/SEA/SH prevention and respect for neighbouring communities.</li> <li>Manage worker accommodation and site security.</li> <li>Establish and maintain worker and community grievance mechanisms.</li> <li>Investigate and address reported incidents promptly.</li> </ul> | <p>Monthly monitoring throughout the construction phase of:</p> <ul style="list-style-type: none"> <li>Number of community health and safety incidents</li> <li>Number of security incidents</li> <li>Number of community health and safety complaints</li> <li>Number of emergency incidents affecting the public</li> </ul> | EPC Contractor |
| Increased risk of transmissible diseases | Workers, neighbouring communities, vulnerable groups | <ul style="list-style-type: none"> <li>Establish and implement workforce and community health awareness programmes.</li> <li>Implement HIV/STI awareness and prevention initiatives.</li> <li>Integrate health awareness into worker induction and training.</li> <li>Provide access to condoms and sexual health information for workers.</li> </ul>                                                                                                            | -                                                                                                                                                                                                                                                                                                                             | EPC Contractor |

| POTENTIAL IMPACTS                                                | RECEPTOR                                                   | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                | MONITORING                                                                                                                                                                                                                                                                                                                       | RESPONSIBILITY |
|------------------------------------------------------------------|------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                                                                  |                                                            | <ul style="list-style-type: none"> <li>Coordinate with local health authorities on disease prevention initiatives.</li> </ul>                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                  |                |
| Increased nuisance from construction activities                  | Neighbouring communities, businesses, community facilities | <ul style="list-style-type: none"> <li>Establish and implement a Traffic Management Plan.</li> <li>Maintain safe pedestrian and vehicle access throughout construction.</li> <li>Notify affected communities and businesses of planned road closures, traffic diversions and access restrictions prior to implementation.</li> <li>Maintain and reinstate any Project-related damage to public roads in consultation with the relevant road authority.</li> </ul> | <p>Monthly monitoring throughout the construction phase of:</p> <ul style="list-style-type: none"> <li>Number of noise, dust and vibration complaints</li> <li>Dust suppression records</li> <li>Compliance with approved working hours</li> </ul>                                                                               | EPC Contractor |
| Temporary disruption to community access and business activities | Neighbouring communities, businesses, road users           | <ul style="list-style-type: none"> <li>Establish and implement a Traffic Management Plan.</li> <li>Maintain safe pedestrian and vehicle access throughout construction.</li> <li>Notify affected communities and businesses of planned road closures, traffic diversions and access restrictions prior to implementation.</li> <li>Maintain and reinstate any Project-related damage to public roads in consultation with the relevant road authority.</li> </ul> | <p>Monthly monitoring throughout the construction phase of:</p> <ul style="list-style-type: none"> <li>Number of traffic incidents and near misses</li> <li>Number of traffic-related community complaints</li> <li>Driver compliance with approved speed limits</li> <li>Compliance with the Traffic Management Plan</li> </ul> | EPC Contractor |

| POTENTIAL IMPACTS                                              | RECEPTOR                                              | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                               | MONITORING                                                                                                                                                                                                                                                                                | RESPONSIBILITY |
|----------------------------------------------------------------|-------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                                                                |                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <ul style="list-style-type: none"> <li>Number of traffic related complaints</li> </ul>                                                                                                                                                                                                    |                |
| Temporary disruption to airport operations and aviation safety | Airport operator, airport users, aviation authorities | <ul style="list-style-type: none"> <li>Establish and implement an Airport Interface Management Plan.</li> <li>Coordinate construction activities with the airport operator and relevant aviation authorities.</li> <li>Comply with approved aviation height restrictions and safeguarding requirements.</li> <li>Control construction lighting and dust generation to minimise impacts on airport operations.</li> </ul>                                         | <p>Monthly monitoring throughout the construction phase of:</p> <ul style="list-style-type: none"> <li>Number of aviation-related incidents or complaints</li> <li>Compliance with aviation permit conditions</li> <li>Crane and lighting compliance records</li> </ul>                   | EPC Contractor |
| Occupational health and safety risks to workers                | Workers, contractors, subcontractors                  | <ul style="list-style-type: none"> <li>Establish and implement an Occupational Health and Safety Management Plan.</li> <li>Undertake task-specific risk assessments prior to commencing work.</li> <li>Provide appropriate training, supervision and personal protective equipment (PPE).</li> <li>Conduct routine workplace inspections and incident investigations.</li> <li>Establish and implement emergency preparedness and response procedures</li> </ul> | <p>Monthly monitoring throughout the construction phase of:</p> <ul style="list-style-type: none"> <li>Total Recordable Injury Frequency Rate (TRIFR)</li> <li>Number of near misses</li> <li>Number of fatalities</li> <li>PPE compliance</li> <li>Safety training undertaken</li> </ul> | EPC Contractor |

### 6.1.12 Community Health and Safety

| POTENTIAL IMPACTS                          | RECEPTOR                                                                                                                                                               | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | MONITORING                                                                                                                                                                                                 | RESPONSIBILITY |
|--------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Worker Influx and Community Health Impacts | Residents of Ilgor MFY (Eco-City area), Chekshura MFY, Ortashura MFY, nearby Eco City developments (residential, institutional and commercial users within 2.5 km Aol) | <ul style="list-style-type: none"> <li>Develop and implement a Labour Influx Management Plan (LIMP) aligned with IFC PS4, addressing workforce demographics, accommodation strategy, service demand, community interaction risks, and cumulative impacts with other Eco City developments.</li> <li>Implement a structured local recruitment strategy, including transparent hiring procedures in coordination with mahalla committees and local employment centres to maximise local employment and reduce migrant worker inflow.</li> <li>Provide worker accommodation in line with IFC/EBRD Workers' Accommodation Standards, including adequate living space, potable water, sanitation, drainage, solid waste management, pest control, ventilation, fire safety, and recreational facilities. Accommodation will be routinely inspected and audited.</li> <li>Establish a Worker Code of Conduct (CoC) translated into relevant languages, covering prohibition of GBVH/SEA/SH, discrimination, violence, substance abuse, wildlife exploitation, and interaction boundaries with local communities. Enforcement will include disciplinary sanctions and termination clauses.</li> <li>Implement mandatory induction training and periodic refresher training covering: community health and safety, cultural sensitivity, communicable disease prevention, HIV/STI awareness, road safety, and grievance procedures.</li> </ul> | <ul style="list-style-type: none"> <li>Total workforce numbers.</li> <li>Workforce origin (local/non-local).</li> <li>Accommodation occupancy rates</li> <li>Worker-community related incidents</li> </ul> | EPC Contractor |

| POTENTIAL IMPACTS           | RECEPTOR                                                          | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | MONITORING                                                                                                             | RESPONSIBILITY |
|-----------------------------|-------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|----------------|
|                             |                                                                   | <ul style="list-style-type: none"> <li>Establish camp management systems including security controls, visitor restrictions, curfews (if required), and behaviour monitoring.</li> <li>Provide on-site welfare, recreation, and food services to reduce worker mobility into surrounding communities and minimise informal economic pressures.</li> <li>Appoint a PR &amp; Admin role responsible for structured engagement, grievance intake, monitoring of social tensions, and coordination with mahalla leaders.</li> <li>Implement a project-level Grievance Redress Mechanism (GRM) with multiple access points (in-person, phone, written, digital), confidential handling procedures, and defined response timelines.</li> <li>Conduct community health awareness programmes in collaboration with local health authorities covering communicable diseases, hygiene practices, and preventive health measures.</li> <li>Undertake health screening and medical fitness certification for all workers prior to mobilisation, including periodic health surveillance during construction.</li> <li>Monitor community perception indicators and social risks through regular stakeholder engagement meetings and feedback surveys</li> </ul> |                                                                                                                        |                |
| Public and Community Safety | Local road users, pedestrians, residents along access routes, Eco | <ul style="list-style-type: none"> <li>Develop and implement a comprehensive Traffic Management Plan (TMP) aligned with IFC PS4, including designated haul routes, traffic scheduling,</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <ul style="list-style-type: none"> <li>Number of vehicle movements, compliance with designated haul routes,</li> </ul> | EPC Contractor |

| POTENTIAL IMPACTS | RECEPTOR                                                    | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | MONITORING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | RESPONSIBILITY |
|-------------------|-------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                   | City internal roads, nearby schools/institutional receptors | <p>convoy management, speed limits, and driver behaviour standards.</p> <ul style="list-style-type: none"> <li>Conduct road safety risk assessments for all major access routes prior to construction and update periodically as works progress.</li> <li>Install and maintain road safety infrastructure, including signage, warning systems, speed calming measures (speed bumps, rumble strips), pedestrian crossings, and reflective markings in coordination with local authorities.</li> <li>Deploy trained traffic marshals and flagmen at high-risk intersections, site entrances, and pedestrian crossing points during peak movement periods.</li> <li>Enforce strict driver management protocols, including defensive driving training, fatigue management, maximum driving hours, vehicle speed monitoring (GPS tracking), and disciplinary enforcement for violations.</li> <li>Schedule material deliveries outside peak school and community movement hours where feasible to reduce exposure risks.</li> <li>Ensure all vehicles undergo routine inspection and certification, including braking systems, lighting, reversing alarms, and load securing procedures.</li> <li>Conduct community road safety awareness campaigns, including school-based programmes where relevant, focusing on pedestrian safety and construction traffic awareness.</li> </ul> | <p>speed limits, traffic control measures, and driver requirements</p> <ul style="list-style-type: none"> <li>Number and severity of road traffic accidents, near misses, pedestrian incidents, vehicle collisions, and emergency vehicle-related incidents involving Project activities</li> <li>Compliance status of road signage, traffic calming measures, pedestrian crossings, lighting, traffic marshals, and access controls</li> <li>Number of unauthorised access incidents, trespassing events, perimeter breaches, and public access violations recorded</li> </ul> |                |

| POTENTIAL IMPACTS  | RECEPTOR                                                                            | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | MONITORING                                                                                                                                                                                                                                                                                                                                                                             | RESPONSIBILITY |
|--------------------|-------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                    |                                                                                     | <ul style="list-style-type: none"> <li>Coordinate with Eco City developers and municipal authorities to ensure cumulative traffic impacts are jointly managed.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                        |                |
| Community Security | Local communities, Eco City residents, vulnerable groups (women, children, elderly) | <ul style="list-style-type: none"> <li>Develop and implement a Project Security Management Plan (PSMP) aligned with IFC PS4 and Good Practice Handbook on Security Forces.</li> <li>Ensure all security personnel receive human rights, proportional use of force, GBVH/SEA/SH prevention, and grievance handling training.</li> <li>Enforce strict Code of Conduct for security staff, including zero tolerance for abuse, harassment, or intimidation.</li> <li>Establish controlled access systems, including vehicle registration, visitor logs, and screening procedures.</li> <li>Install and maintain CCTV surveillance systems and adequate lighting at site boundaries, access gates, and high-risk zones.</li> <li>Maintain incident reporting and escalation protocols, integrated with the GRM and HSE systems.</li> <li>Conduct regular stakeholder engagement meetings with mahalla leaders and local authorities to address security concerns.</li> <li>Coordinate security arrangements with local law enforcement agencies to ensure proportional response and accountability</li> </ul> | <ul style="list-style-type: none"> <li>Percentage of security personnel trained in human rights, use of force, conflict de-escalation, grievance handling, stakeholder engagement, and GBVH awareness</li> <li>Number of reported incidents involving use of force, allegations of misconduct, human rights complaints, or community concerns related to security personnel</li> </ul> | EPC Contractor |

| POTENTIAL IMPACTS                                                             | RECEPTOR                                                                            | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | MONITORING                                                                                                                                                                                                                    | RESPONSIBILITY |
|-------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Gender-Based Violence, Harassment, and Sexual Exploitation & Abuse (GBVH/SEA) | Women, children, vulnerable households within Core Impact Area                      | <ul style="list-style-type: none"> <li>Implement a comprehensive GBV/SEA/SH Prevention and Response Framework, including a formal policy applicable to all contractors and subcontractors.</li> <li>Conduct mandatory GBV/SEA/SH training and refresher training for all workers, supervisors, and management staff.</li> <li>Establish a confidential, survivor-centred grievance mechanism, ensuring anonymity, non-retaliation, and safe reporting channels (including third-party reporting options).</li> <li>Develop referral pathways for medical, psychosocial, and legal support services, in collaboration with local service providers.</li> <li>Conduct community awareness programmes targeting both men and women on GBV risks, prevention, and available support mechanisms.</li> <li>Improve lighting in and around camps, access roads, and construction zones to reduce risk exposure.</li> <li>Engage mahalla committees, local NGOs, and healthcare providers for coordinated prevention and response.</li> <li>Maintain strict confidentiality protocols and data protection systems for all reported cases.</li> </ul> | <ul style="list-style-type: none"> <li>Number of GBVH, SEA, SH, harassment, discrimination, or exploitation complaints reported, investigated, referred, and closed in accordance with survivor-centred procedures</li> </ul> | EPC Contractor |
| Risks to Vulnerable Groups                                                    | Women-headed households, elderly, persons with disabilities, low-income households, | <ul style="list-style-type: none"> <li>Ensure inclusive and accessible stakeholder engagement processes, including meetings in local languages (Uzbek and Russian).</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <ul style="list-style-type: none"> <li>Number of consultations undertaken with women, elderly persons, persons with</li> </ul>                                                                                                | EPC Contractor |

| POTENTIAL IMPACTS             | RECEPTOR                                                                                 | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | MONITORING                                                                                                                                                                                                                                                                                                                                    | RESPONSIBILITY |
|-------------------------------|------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                               | marginalized groups                                                                      | <ul style="list-style-type: none"> <li>Provide non-digital communication channels (community notice boards, face-to-face engagement) for vulnerable populations.</li> <li>Implement targeted employment and training opportunities for vulnerable groups where feasible.</li> <li>Design safe pedestrian access routes and mobility support measures for persons with disabilities and elderly residents.</li> <li>Ensure GRM accessibility and support services, including assistance for illiterate or disabled complainants.</li> <li>Undertake disaggregated monitoring of impacts to track differential effects on vulnerable groups.</li> <li>Coordinate with mahalla committees to ensure early identification and support for at-risk households.</li> </ul> | disabilities, low-income households, youth, and other vulnerable groups identified in the ESIA                                                                                                                                                                                                                                                |                |
| Traffic and Road Safety Risks | Increased construction traffic may cause congestion, accidents, and road-user conflicts. | <ul style="list-style-type: none"> <li>Implement Construction Traffic Management Plan</li> <li>Designate and enforce haul routes</li> <li>Schedule deliveries outside peak traffic periods</li> <li>Enforce speed limits and driver safety protocols</li> <li>Deploy traffic marshals at critical junctions</li> <li>Maintain vehicles in roadworthy condition</li> <li>Install warning signage and road lighting</li> <li>Coordinate traffic planning with Eco City developers and authorities</li> </ul>                                                                                                                                                                                                                                                           | <ul style="list-style-type: none"> <li>Number of vehicle movements, compliance with designated haul routes, speed limits, traffic control measures, and driver requirements</li> <li>Number and severity of road traffic accidents, near misses, pedestrian incidents, vehicle collisions, and emergency vehicle-related incidents</li> </ul> | EPC Contractor |

| POTENTIAL IMPACTS                              | RECEPTOR                                                                                                | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | MONITORING                                                                                                                                                                                                               | RESPONSIBILITY |
|------------------------------------------------|---------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                                                |                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>involving Project activities</p> <ul style="list-style-type: none"> <li>Compliance status of road signage, traffic calming measures, pedestrian crossings, lighting, traffic marshals, and access controls</li> </ul> |                |
| Dust, Air Quality and Community Health Impacts | Residents within Eco City residential zones (~562 m), nearby community (~1 km), institutional receptors | <ul style="list-style-type: none"> <li>Apply dust suppression measures, including continuous water spraying on haul roads, exposed surfaces, stockpiles, and during demolition/excavation works.</li> <li>Ensure all haul trucks carrying loose materials are fully covered and sealed to prevent dust dispersion.</li> <li>Install and operate wheel-wash facilities at site exits to prevent off-site soil tracking.</li> <li>Implement noise control measures, including use of low-noise equipment, regular maintenance of machinery, installation of silencers/mufflers, and acoustic enclosures for high-noise equipment where required.</li> <li>Restrict noisy activities to daytime hours near sensitive receptors and apply scheduling controls for high-impact works (piling, excavation).</li> <li>Install temporary noise barriers where construction activities occur near residential areas.</li> <li>Conduct routine ambient air quality and noise monitoring at site boundaries and nearest sensitive</li> </ul> | <ul style="list-style-type: none"> <li>Number of complaints related to noise, dust, lighting, odours, traffic, waste handling, visual impacts, and other nuisance effects</li> </ul>                                     | EPC Contractor |

| POTENTIAL IMPACTS                                         | RECEPTOR                                                                                 | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | MONITORING | RESPONSIBILITY |
|-----------------------------------------------------------|------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                                                           |                                                                                          | <p>receptors, with corrective actions triggered if exceedances occur.</p> <ul style="list-style-type: none"> <li>Maintain equipment and vehicles to ensure compliance with emission standards, including regular servicing and inspection.</li> <li>Communicate short-term high-impact works schedules to nearby communities in advance via notices and liaison channels.</li> </ul>                                                                                                                                                                                                 |            |                |
| Noise and Vibration Impacts on Community Wellbeing        | Construction noise and vibration may disturb nearby communities and sensitive receptors. | <ul style="list-style-type: none"> <li>Restrict high-noise works to daytime hours</li> <li>Use low-noise equipment where feasible</li> <li>Install temporary noise barriers near receptors</li> <li>Maintain equipment to minimise noise emissions</li> <li>Establish buffer zones between works and residences</li> <li>Conduct pre-construction condition surveys</li> <li>Monitor vibration during piling or heavy works</li> </ul>                                                                                                                                               |            | EPC Contractor |
| Communicable Disease Transmission and Public Health Risks | Nearby communities, construction workforce interface zones, vulnerable groups            | <ul style="list-style-type: none"> <li>Implement a Communicable Disease Prevention and Control Plan aligned with IFC PS4 requirements.</li> <li>Provide safe and potable drinking water, sanitation facilities, and hygiene stations at all worker accommodation and construction sites.</li> <li>Conduct routine health screening and surveillance of workers, including pre-employment and periodic checks.</li> <li>Implement vector control programmes, including elimination of stagnant water, pest control, regular waste removal, and environmental housekeeping.</li> </ul> | -          | EPC Contractor |

| POTENTIAL IMPACTS                         | RECEPTOR                                                                     | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | MONITORING                                                                                                                                                                                        | RESPONSIBILITY |
|-------------------------------------------|------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                                           |                                                                              | <ul style="list-style-type: none"> <li>Deliver health education and awareness campaigns for workers and nearby communities covering TB, HIV/AIDS, STIs, respiratory infections, and hygiene practices.</li> <li>Ensure proper solid waste and wastewater management systems, preventing contamination of surrounding environment.</li> <li>Coordinate with local health authorities for early detection and outbreak response protocols.</li> <li>Maintain health incident reporting systems integrated into the project HSE management system</li> </ul>                                                                                                                                                                                                                                               |                                                                                                                                                                                                   |                |
| Community Exposure to Hazardous Materials | Residents, pedestrians, children, Eco City users near construction perimeter | <ul style="list-style-type: none"> <li>Install and maintain secure perimeter fencing with controlled access points around all construction zones.</li> <li>Provide clear hazard signage, warning boards, and multilingual safety notices at all entry points and high-risk areas.</li> <li>Establish strict access control systems, including ID cards, visitor permits, PPE enforcement, and entry authorisation procedures.</li> <li>Implement safe pedestrian diversion routes clearly separated from construction zones using barriers and signage.</li> <li>Secure all excavation pits, trenches, and open structures using barriers, covers, lighting, and reflective markings.</li> <li>Conduct daily site safety inspections and weekly HSE audits, with corrective action tracking.</li> </ul> | <ul style="list-style-type: none"> <li>Quantities of hazardous substances stored and used, inventory tracking, storage inspections, and compliance with hazardous materials procedures</li> </ul> | EPC Contractor |

| POTENTIAL IMPACTS                                   | RECEPTOR                                                                   | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | MONITORING                                                                                                                                                                                                                                       | RESPONSIBILITY |
|-----------------------------------------------------|----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                                                     |                                                                            | <ul style="list-style-type: none"> <li>Maintain 24/7 site security presence to prevent unauthorised access, particularly during non-working hours.</li> <li>Ensure emergency access routes remain unobstructed at all times for ambulance and fire services</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                  |                |
| Emergency Preparedness and Community Response Risks | Nearby communities, Eco City users, construction workforce interface zones | <ul style="list-style-type: none"> <li>Develop and implement a comprehensive Emergency Preparedness and Response Plan (EPRP) covering fire, explosion, spill, structural failure, and medical emergencies.</li> <li>Establish on-site emergency response teams trained in first aid, fire response, and evacuation procedures.</li> <li>Conduct regular emergency drills and simulation exercises involving workers and contractors.</li> <li>Maintain formal coordination agreements with local hospitals, ambulance services, and fire departments in Fergana.</li> <li>Ensure unobstructed emergency access routes across the construction site at all times.</li> <li>Install firefighting equipment, alarms, and emergency communication systems at all site facilities and camps.</li> <li>Implement incident reporting and investigation procedures linked to corrective action tracking systems.</li> </ul> | <ul style="list-style-type: none"> <li>Number of emergency drills conducted, including fire, hazardous materials incidents, medical emergencies, disease outbreaks, utility failures, security incidents, and mass casualty scenarios</li> </ul> | EPC Contractor |

### 6.1.13 Labour and Working Conditions

| POTENTIAL IMPACTS                                               | RECEPTOR                                                        | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                          | MONITORING                                                                                                                                                                                                                                                                                                                                                                       | RESPONSIBILITY |
|-----------------------------------------------------------------|-----------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Employment Generation and Local Economic Benefits               | Local communities, local job seekers, regional workforce        | <ul style="list-style-type: none"> <li>Prioritise recruitment of qualified local workers where feasible.</li> <li>Advertise vacancies transparently through local employment centres and mahalla committees.</li> <li>Implement skills development and on-the-job training opportunities.</li> <li>Promote equal access to employment opportunities.</li> </ul>                             | <p>Monthly monitoring throughout the construction phase of:</p> <ul style="list-style-type: none"> <li>Number and % of local workers employed</li> <li>Number and % of local businesses contracted</li> <li>Value of procurement awarded to local suppliers</li> <li>% workers with verified contracts; wage verification; age verification; employment documentation</li> </ul> | EPC Contractor |
| Labour rights, employment conditions, and contractor management | Project workforce (direct, subcontracted, supply chain workers) | <ul style="list-style-type: none"> <li>Implementation of Labour Management Plan (LMP).</li> <li>Written contracts for all workers.</li> <li>Prohibition of forced/child labour</li> <li>No recruitment fees.</li> <li>Clear wage and working hour policies.</li> <li>Contractor compliance monitoring.</li> <li>Audits and inspections.</li> <li>Grievance mechanism for workers</li> </ul> | <ul style="list-style-type: none"> <li>% of workers with written employment contracts.</li> <li>% workers with verified contracts; wage verification; age verification; employment documentation</li> <li>Compliance with wage payment schedules</li> </ul>                                                                                                                      | EPC Contractor |

| POTENTIAL IMPACTS                    | RECEPTOR                                                  | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | MONITORING                                                                                                                                                                                                                                                                                                                                                                                       | RESPONSIBILITY |
|--------------------------------------|-----------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                                      |                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>(timeliness and completeness).</p> <ul style="list-style-type: none"> <li>Records of overtime hours and voluntary consent.</li> <li>Number of labour-related grievances received and resolved.</li> <li>Instances of non-compliance identified in audits</li> <li>Compliance with IFC/EBRD Workers' Accommodation Standards; fire safety inspections; occupancy vs design capacity</li> </ul> |                |
| Occupational Health and Safety (OHS) | Construction workers, subcontractors, visitors, suppliers | <ul style="list-style-type: none"> <li>Develop and implement a Construction Occupational Health and Safety Management Plan aligned with IFC PS2, EBRD PR2 and WBG EHS Guidelines.</li> <li>Conduct task-specific risk assessments and Job Safety Analyses (JSAs).</li> <li>Implement Permit-to-Work systems for high-risk activities including confined spaces, lifting operations, excavation, hot works and work at height.</li> <li>Provide mandatory PPE at no cost to workers.</li> <li>Conduct induction training, toolbox talks and refresher training.</li> </ul> | <ul style="list-style-type: none"> <li>Lost Time Injury Frequency Rate.</li> <li>Total Recordable Incident Rate.</li> <li>Number of near-miss incidents reported.</li> <li>PPE compliance rates.</li> <li>Number of safety trainings conducted and attendance levels.</li> <li>Findings from site inspections and audits.</li> </ul>                                                             | EPC Contractor |

| POTENTIAL IMPACTS                          | RECEPTOR                                 | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | MONITORING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | RESPONSIBILITY |
|--------------------------------------------|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                                            |                                          | <ul style="list-style-type: none"> <li>Maintain first aid facilities, emergency response arrangements and trained first aiders.</li> <li>Undertake routine inspections, audits and incident investigations.</li> <li>Monitor contractor and subcontractor OHS performance through KPIs and reporting.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                           | <ul style="list-style-type: none"> <li>Number of corrective actions closed on time</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                 |                |
| Worker accommodation and living conditions | Migrant workers and accommodated workers | <ul style="list-style-type: none"> <li>A Workers' Accommodation Management Plan, aligned with IFC/EBRD Workers' Accommodation Guidance, will be developed and implemented to govern on-site living arrangements.</li> <li>On-site accommodation will be provided with adequate sleeping quarters, safe potable water, sanitation facilities, appropriate heating and ventilation, and essential welfare amenities.</li> <li>Regular inspections and audits of the accommodation facilities will be undertaken to ensure compliance with health, safety, and hygiene standards.</li> <li>Workers will have access to healthcare services, recreational facilities, and an effective grievance redress mechanism.</li> </ul> | <ul style="list-style-type: none"> <li>Occupancy rates vs design capacity.</li> <li>Hygiene inspection scores.</li> <li>Availability of potable water, sanitation, and waste facilities.</li> <li>Number of health or safety non-conformities identified.</li> <li>Worker satisfaction feedback results.</li> <li>Incidents of communicable disease outbreaks</li> <li>Compliance with IFC/EBRD Workers' Accommodation Standards; fire safety inspections; occupancy vs design capacity for workers accommodation.</li> </ul> | EPC Contractor |

| POTENTIAL IMPACTS                       | RECEPTOR                                                                                       | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | MONITORING                                                                                                                                                                                                                                                                                                                                                    | RESPONSIBILITY |
|-----------------------------------------|------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Labour influx and community interaction | Local communities, local authorities, migrant workers                                          | <ul style="list-style-type: none"> <li>• Implement a Labour Influx Management Plan.</li> <li>• Prioritise local recruitment where feasible.</li> <li>• Develop workforce mobilisation and demobilisation procedures.</li> <li>• Provide cultural awareness and behavioural training.</li> <li>• Implement and enforce a Worker Code of Conduct.</li> <li>• Coordinate regularly with local authorities and mahalla representatives.</li> <li>• Implement a Labour Management Plan (LMP).</li> </ul>                                                                                                                                   | <ul style="list-style-type: none"> <li>• Ratio of local vs non-local workers.</li> <li>• Number of community complaints linked to workforce behaviour.</li> <li>• Housing occupancy pressure in surrounding areas (qualitative tracking).</li> <li>• Incidents involving worker-community interactions.</li> <li>• Compliance with Code of Conduct</li> </ul> | EPC Contractor |
| Child labour and forced labour risks    | Direct workers, contractor workers, subcontractor workers, migrant workers, vulnerable workers | <ul style="list-style-type: none"> <li>• Ensure all workers are employed under written contracts in a language they understand.</li> <li>• Apply transparent recruitment procedures and prohibit recruitment fees.</li> <li>• Implement age verification procedures and maintain employment records.</li> <li>• Prohibit forced labour, bonded labour, child labour and human trafficking.</li> <li>• Undertake labour audits of contractors, subcontractors and labour agencies.</li> <li>• Include labour compliance obligations in all contracts.</li> <li>• Conduct periodic labour inspections and worker interviews.</li> </ul> | <ul style="list-style-type: none"> <li>• % of workers with verified age documentation</li> <li>• Number of recruitment audits conducted</li> <li>• Findings from subcontractor labour inspections</li> <li>• Incidents of forced labour indicators identified</li> <li>• Use of recruitment fees (zero tolerance monitoring)</li> </ul>                       | EPC Contractor |

| POTENTIAL IMPACTS                                                                                            | RECEPTOR                                                               | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | MONITORING                                                                                                                                                                                                                                                                                                                    | RESPONSIBILITY |
|--------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Gender-Based Violence and Harassment (GBVH), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) | Female workers, vulnerable workers, local women and girls, communities | <ul style="list-style-type: none"> <li>Develop and implement a GBVH/SEA/SH Prevention and Response Plan.</li> <li>Adopt and enforce a Worker Code of Conduct.</li> <li>Conduct mandatory awareness training for all workers.</li> <li>Establish survivor-centred grievance procedures and referral pathways.</li> <li>Provide gender-sensitive accommodation and welfare facilities.</li> <li>Monitor incidents and undertake corrective actions.</li> <li>Engage with local stakeholders regarding GBVH risks.</li> </ul>                                                           | <ul style="list-style-type: none"> <li>Number of GBVH/SEA/SH complaints reported.</li> <li>Percentage of cases resolved within defined timelines.</li> <li>Training coverage on GBVH awareness (%).</li> <li>Disciplinary actions related to misconduct.</li> <li>Functionality of confidential reporting channels</li> </ul> | EPC Contractor |
| Wages, Working Hours, Right to Health & Rest and Job Security                                                | All workers                                                            | <ul style="list-style-type: none"> <li>Ensure compliance with Labour Code requirements for wages, overtime and rest periods.</li> <li>Maintain transparent payroll systems and wage records.</li> <li>Ensure overtime is voluntary and compensated appropriately.</li> <li>Conduct payroll audits and workforce interviews.</li> <li>Clearly communicate employment duration and conditions.</li> <li>Implement Workforce Health Management Programme.</li> <li>Provide access to medical services and first aid facilities.</li> <li>Conduct health awareness campaigns.</li> </ul> | <ul style="list-style-type: none"> <li>Average weekly working hours per worker category</li> <li>Overtime hours and compliance with legal thresholds</li> <li>Wage payment delays (number of cases)</li> <li>Wage deduction complaints</li> <li>Contract compliance rates</li> </ul>                                          | EPC Contractor |

| POTENTIAL IMPACTS                                | RECEPTOR                       | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | MONITORING | RESPONSIBILITY |
|--------------------------------------------------|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                                                  |                                | <ul style="list-style-type: none"> <li>Implement communicable disease prevention measures.</li> <li>Maintain sanitation, hygiene and waste management standards.</li> <li>Establish outbreak response procedures.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |            |                |
| Collective Bargaining and Freedom of Association | All workers                    | <ul style="list-style-type: none"> <li>Respect workers' rights to organise and collectively bargain in accordance with national legislation.</li> <li>Facilitate worker representation mechanisms.</li> <li>Ensure no retaliation against worker representatives.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | -          | EPC Contractor |
| Workers' freedom of movement                     | Workers in accommodation camps | <ul style="list-style-type: none"> <li>Workers shall retain full freedom of movement outside working hours, subject only to reasonable site safety and security requirements.</li> <li>No physical barriers, curfews, or administrative controls shall be imposed that amount to confinement or involuntary restriction.</li> <li>Any access controls to construction sites or accommodation areas will be strictly for safety, asset protection, and emergency management purposes.</li> <li>A written set of accommodation rules shall be developed, communicated, and signed by all residents upon arrival.</li> <li>Rules will define acceptable behaviour, quiet hours, hygiene standards, visitor policies, and grievance procedures.</li> <li>The rules shall be applied consistently and transparently to avoid arbitrary enforcement or discrimination.</li> </ul> | -          | EPC Contractor |

| POTENTIAL IMPACTS          | RECEPTOR                                                                         | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | MONITORING                                                                                                                                                                                                                                                                                                                                            | RESPONSIBILITY |
|----------------------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                            |                                                                                  | <ul style="list-style-type: none"> <li>Workers will be informed of disciplinary procedures and their right to appeal any sanctions.</li> <li>Establish and maintain a dedicated Worker Grievance Mechanism accessible to direct and contracted workers.</li> </ul>                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                       |                |
| Worker Grievance Mechanism | All workers                                                                      | <ul style="list-style-type: none"> <li>Allow anonymous submissions.</li> <li>Ensure confidentiality and protection against retaliation.</li> <li>Maintain grievance registers and response timelines.</li> <li>Include specific channels for GBVH-related complaints</li> </ul>                                                                                                                                                                                                                                                                    | <ul style="list-style-type: none"> <li>Number of grievances received (by category)</li> <li>% of grievances resolved within agreed timeframe</li> <li>Worker awareness of grievance mechanism (%)</li> <li>Worker representation meetings held</li> <li>Absence of retaliation cases reported</li> </ul>                                              | EPC Contractor |
| Retrenchment               | Direct employees of EPC contractor, subcontractors, and informal/migrant workers | <ul style="list-style-type: none"> <li>Develop and implement a Retrenchment Policy and Procedure consistent with IFC PS2 and Uzbekistan Labour Code.</li> <li>Provide adequate notice periods to all affected workers in line with contractual and legal requirements.</li> <li>Conduct transparent selection criteria for retrenchment based on skill, performance, and operational requirements, avoiding discrimination.</li> <li>Ensure timely payment of all outstanding wages, benefits, severance pay, and social contributions.</li> </ul> | <ul style="list-style-type: none"> <li>Implementation of retrenchment procedures in line with national labour law and IFC PS2</li> <li>Issuance of prior notice to affected workers</li> <li>Timely payment of wages, severance, and all terminal benefits</li> <li>Provision of employment certificates and work experience documentation</li> </ul> | EPC Contractor |

| POTENTIAL IMPACTS  | RECEPTOR                          | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | MONITORING                                                                                                                                                                                                                                                                                                   | RESPONSIBILITY |
|--------------------|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                    |                                   | <ul style="list-style-type: none"> <li>• Provide end-of-contract documentation (employment certificates, experience letters).</li> <li>• Implement worker transition support measures, such as job placement assistance within other Project packages or referrals to other local employment opportunities.</li> <li>• Engage subcontractors to ensure consistent retrenchment standards across supply chain.</li> <li>• Establish a worker grievance mechanism to address disputes related to termination and compensation.</li> <li>• Conduct awareness sessions for workers on end-of-contract rights and entitlements.</li> </ul> | <ul style="list-style-type: none"> <li>• Functioning of grievance mechanism for termination-related complaints</li> <li>• Compliance of subcontractors with retrenchment and labour transition requirements</li> </ul>                                                                                       |                |
| Supply Chain Risks | Supplier and contractor workforce | <ul style="list-style-type: none"> <li>• Implement a Supply Chain Management Plan and Supplier Code of Conduct.</li> <li>• Undertake labour and human rights due diligence for primary suppliers.</li> <li>• Screen suppliers for child labour, forced labour and OHS risks.</li> <li>• Conduct supplier audits and corrective action monitoring.</li> <li>• Include contractual rights to suspend or terminate non-compliant suppliers.</li> <li>• Notify lenders of material labour rights violations.</li> </ul>                                                                                                                   | <ul style="list-style-type: none"> <li>• % of suppliers screened for labour risks</li> <li>• Number of supplier audits conducted</li> <li>• Non-compliance findings (child labour, OHS, wages, etc.)</li> <li>• Corrective action plan completion rate</li> <li>• High-risk supplier list updates</li> </ul> | EPC Contractor |

### 6.1.14 Human Rights

| POTENTIAL IMPACTS                            | RECEPTOR                                                                                 | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | MONITORING                                                                                                                                                                                                                                               | RESPONSIBILITY |
|----------------------------------------------|------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Child labour                                 | Potential underage people in informal/subcontracted labour chains, low-income households | <ul style="list-style-type: none"> <li>Implement a Child Labour Policy prohibiting employment of persons below the legal working age.</li> <li>Verify age through official identification documents prior to recruitment.</li> <li>Include child labour prohibition clauses in contractor and subcontractor agreements.</li> <li>Conduct periodic labour audits and inspections.</li> <li>Establish reporting procedures for suspected child labour cases and implement corrective actions where necessary.</li> </ul>               | <ul style="list-style-type: none"> <li>Age verification and prohibition of child labour</li> </ul>                                                                                                                                                       | EPC Contractor |
| Forced labour                                | Construction workers (direct, subcontracted, migrant labour)                             | <ul style="list-style-type: none"> <li>Prohibit all forms of forced, bonded, trafficked, or involuntary labour.</li> <li>Ensure workers are employed through transparent recruitment processes and receive written employment contracts.</li> <li>Prohibit retention of passports, identity documents, or personal belongings.</li> <li>Prohibit recruitment fees charged to workers.</li> <li>Conduct regular contractor and labour broker compliance audits.</li> <li>Establish confidential worker grievance channels.</li> </ul> | <ul style="list-style-type: none"> <li>Worker interviews, grievance mechanism records, contractor audits, recruitment records.</li> <li>HR records, employment contracts, payroll records, contractor/service provider reports, labour audits</li> </ul> | EPC Contractor |
| Right to Safe and Healthy Working Conditions | Construction workforce, including contractor and                                         | <ul style="list-style-type: none"> <li>Implement a Project Occupational Health and Safety Management System as part of the ESMS.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                          | <ul style="list-style-type: none"> <li>Worker interviews, grievance mechanism</li> </ul>                                                                                                                                                                 | EPC Contractor |

| POTENTIAL IMPACTS                                                    | RECEPTOR                                                                                                 | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | MONITORING                                                                                                                                                                                                                                                                                                                                                         | RESPONSIBILITY |
|----------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| (Occupational Health and Safety)                                     | subcontractor personnel                                                                                  | <ul style="list-style-type: none"> <li>Require contractors to prepare and implement Project-specific OHS Plans.</li> <li>Implement Permit-to-Work systems for high-risk activities.</li> <li>Undertake Job Hazard Analyses and task-specific risk assessments.</li> <li>Provide competency-based training and regular toolbox talks.</li> <li>Provide appropriate PPE and enforce its use.</li> <li>Conduct routine workplace inspections and contractor audits.</li> <li>Maintain incident reporting, investigation and corrective action procedures.</li> <li>Prepare Emergency Preparedness and Response Plans.</li> <li>Monitor occupational health performance and safety statistics.</li> </ul> | <p>records, contractor audits</p> <ul style="list-style-type: none"> <li>Incident records, OHS inspections, safety reports, training records, OHS management reports</li> <li>Occupational health records, incident reports, infection control records, employee health monitoring</li> <li>Training registers, HR systems, contractor training reports</li> </ul> |                |
| Right to Work, Livelihood and Fair Employment (Workforce Transition) | Existing healthcare employees potentially affected by workforce transition, Ministry of Health personnel | <ul style="list-style-type: none"> <li>Develop a Workforce Transition Framework in coordination with the Ministry of Health.</li> <li>Undertake workforce mapping and employment planning.</li> <li>Communicate workforce transition arrangements transparently.</li> <li>Apply fair, objective and non-discriminatory employment criteria.</li> <li>Where applicable, prepare retrenchment plans consistent with IFC Performance Standard 2.</li> </ul>                                                                                                                                                                                                                                              | <ul style="list-style-type: none"> <li>Recruitment records, promotion records, training records, workforce demographic data</li> <li>HR records, employment contracts, payroll records, contractor/service</li> </ul>                                                                                                                                              | EPC Contractor |

| POTENTIAL IMPACTS                         | RECEPTOR                                                                                      | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | MONITORING                                                                                                                                                                             | RESPONSIBILITY |
|-------------------------------------------|-----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                                           |                                                                                               | <ul style="list-style-type: none"> <li>Consult affected employees throughout transition planning.</li> <li>Maintain a dedicated worker grievance mechanism for employment-related concerns.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                    | <p>provider reports, labour audits</p> <ul style="list-style-type: none"> <li>Worker interviews, grievance records, contractor/service provider audits, recruitment records</li> </ul> |                |
| Mental Health and Psychosocial Well-being | Construction workers, employees potentially affected by workforce transition                  | <ul style="list-style-type: none"> <li>Promote reasonable working hours and fatigue management.</li> <li>Provide adequate worker welfare and accommodation facilities.</li> <li>Communicate regularly regarding workforce changes and Project activities.</li> <li>Train supervisors to recognise work-related stress and fatigue.</li> <li>Facilitate referral to counselling or employee assistance services where available.</li> <li>Encourage worker engagement and peer support.</li> <li>Monitor psychosocial wellbeing through worker engagement and grievance trends.</li> </ul> | <ul style="list-style-type: none"> <li>Worker interviews, grievance records, contractor/service provider audits, recruitment records</li> </ul>                                        | EPC Contractor |
| Non-discrimination and Equal Opportunity  | Women, persons with disabilities, older workers, migrant workers and other vulnerable workers | <ul style="list-style-type: none"> <li>Implement an Equal Opportunity and Non-discrimination Policy.</li> <li>Apply transparent competency-based recruitment procedures.</li> <li>Ensure equal remuneration for work of equal value.</li> </ul>                                                                                                                                                                                                                                                                                                                                           | <ul style="list-style-type: none"> <li>HR records, employment contracts, payroll records, contractor/service provider reports, labour audits</li> </ul>                                |                |

| POTENTIAL IMPACTS  | RECEPTOR                                                              | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | MONITORING                                                                                                                                                                                                                                                                                                                                                                                                     | RESPONSIBILITY |
|--------------------|-----------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                    |                                                                       | <ul style="list-style-type: none"> <li>• Monitor workforce diversity and inclusion.</li> <li>• Provide equal access to training and promotion opportunities.</li> <li>• Establish confidential reporting channels for discrimination.</li> <li>• Investigate and address discrimination complaints promptly.</li> </ul>                                                                                                                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>• Recruitment records, identity verification documentation, contractor and supplier audits</li> <li>• Worker interviews, grievance records, contractor/service provider audits, recruitment records</li> <li>•</li> </ul>                                                                                                                                               |                |
| Working conditions | Construction workforce, including temporary and subcontracted workers | <ul style="list-style-type: none"> <li>• Implement a Labour Management Plan and Occupational Health and Safety Management System.</li> <li>• Provide appropriate PPE and task-specific safety training.</li> <li>• Monitor working hours, overtime, and rest periods in accordance with national legislation and IFC PS2 requirements.</li> <li>• Ensure timely payment of wages and maintain transparent payroll records.</li> <li>• Provide adequate welfare facilities, including potable water, sanitation, rest areas, first aid, and medical support.</li> <li>• Conduct regular workplace inspections and audits</li> </ul> | <ul style="list-style-type: none"> <li>• HR records, contractor payroll systems, labour audits, site inspections</li> <li>• Training registers, HR systems, contractor training reports</li> <li>• Occupational health records, incident reports, infection control records, employee health monitoring</li> <li>• Security incident records, training records, complaints, incident investigations</li> </ul> | EPC Contractor |

| POTENTIAL IMPACTS                                                 | RECEPTOR                                   | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | MONITORING                                                                                                                                                                          | RESPONSIBILITY |
|-------------------------------------------------------------------|--------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Privacy, Freedom of Expression, Association and Peaceful Assembly | Construction workers and site visitors     | <ul style="list-style-type: none"> <li>Establish clear rules governing collection, storage, and use of personal data of workers and visitors (e.g., ID records, biometrics if used, CCTV footage).</li> <li>Inform workers clearly about what data is collected and how it is used, in languages they understand.</li> <li>Limit surveillance practices to proportionate and necessary security purposes, with periodic review of necessity.</li> <li>Establish and maintain a confidential, accessible, and multilingual grievance mechanism covering workers and community members.</li> <li>Ensure non-retaliation policy is clearly communicated and enforced, protecting individuals who raise concerns.</li> <li>Provide multiple reporting channels (in-person, hotline, digital, anonymous options).</li> <li>Conduct regular toolbox talks and inductions reinforcing that workers can freely raise concerns without fear of dismissal or punishment.</li> <li>Encourage worker feedback mechanisms (e.g., worker committees, suggestion systems, periodic surveys).</li> </ul> | <ul style="list-style-type: none"> <li>IT security logs, incident reports, audit findings</li> <li>Worker committee minutes, consultation records, union engagement logs</li> </ul> | EPC Contractor |
| Collective Bargaining and Freedom of Association                  | Construction workers, subcontracted labour | <ul style="list-style-type: none"> <li>Provide accessible grievance and complaint mechanisms for all workers.</li> <li>Encourage engagement with recognised trade unions or worker representatives.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <ul style="list-style-type: none"> <li>Worker committee minutes, consultation records, union engagement logs</li> </ul>                                                             | EPC Contractor |

| POTENTIAL IMPACTS                      | RECEPTOR                                                                                         | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | MONITORING                                                                                                        | RESPONSIBILITY |
|----------------------------------------|--------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|----------------|
|                                        |                                                                                                  | <ul style="list-style-type: none"> <li>Communicate workers' rights to organise clearly, including for subcontracted and temporary staff.</li> <li>Provide training on collective bargaining rights and dispute resolution.</li> <li>Facilitate dialogue between management and worker representatives on wages, working hours, and conditions.</li> </ul>                                                                                                                                                                                                                                |                                                                                                                   |                |
| Gender Inequality and Discrimination   | Female workers, male-dominated workforce interactions, vulnerable women in labour force          | <ul style="list-style-type: none"> <li>Implement Equal Opportunity and Non-Discrimination Policies.</li> <li>Adopt and enforce a Code of Conduct addressing harassment, discrimination, sexual exploitation, abuse, and GBVH.</li> <li>Conduct mandatory GBVH and respectful workplace training for all workers.</li> <li>Promote equal pay for equal work and fair recruitment practices.</li> <li>Establish confidential reporting and survivor-centred response mechanisms.</li> <li>Monitor workforce composition and participation of women in employment opportunities.</li> </ul> | <ul style="list-style-type: none"> <li>Gender equality, discrimination and GBVH incidents</li> </ul>              | EPC Contractor |
| Right to Health and Safety (Community) | Nearby residential communities, vulnerable groups (children, elderly, persons with disabilities) | <ul style="list-style-type: none"> <li>Develop and implement a Community Health, Safety and Security Management Plan.</li> <li>Prepare and implement a Traffic Management Plan.</li> <li>Apply dust suppression measures and noise control practices.</li> </ul>                                                                                                                                                                                                                                                                                                                         | <ul style="list-style-type: none"> <li>Incident logs, toolbox talks, safety inspections, OHSMS reports</li> </ul> | EPC Contractor |

| POTENTIAL IMPACTS                              | RECEPTOR                                                                                   | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | MONITORING                                                                                                                 | RESPONSIBILITY |
|------------------------------------------------|--------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|----------------|
|                                                |                                                                                            | <ul style="list-style-type: none"> <li>Restrict construction activities to approved working hours where feasible.</li> <li>Install warning signage, fencing, and controlled access around active work areas.</li> <li>Undertake community awareness programmes regarding construction hazards.</li> <li>Establish emergency response procedures and communication protocols with nearby communities.</li> </ul>                                                                                                                             |                                                                                                                            |                |
| Access to Information and Public Participation | Affected communities, vulnerable and hard-to-reach groups                                  | <ul style="list-style-type: none"> <li>Implement the Stakeholder Engagement Plan throughout construction.</li> <li>Provide regular updates on construction activities, schedules, and potential disruptions.</li> <li>Disclose information in appropriate languages and accessible formats.</li> <li>Undertake targeted engagement with vulnerable and hard-to-reach groups.</li> <li>Maintain records of consultations and stakeholder feedback.</li> <li>Ensure the grievance mechanism is widely communicated and accessible.</li> </ul> | <ul style="list-style-type: none"> <li>Stakeholder Engagement Plan records, consultation logs, feedback surveys</li> </ul> | EPC Contractor |
| Rights of Vulnerable and Marginalised Groups   | Low-income households, elderly persons, persons with disabilities, women, informal workers | <ul style="list-style-type: none"> <li>Identify vulnerable groups through ongoing stakeholder engagement activities.</li> <li>Ensure consultation processes are inclusive and accessible to persons with disabilities, elderly individuals, women, and low-income households.</li> </ul>                                                                                                                                                                                                                                                    | <ul style="list-style-type: none"> <li>Grievance logs, tracking database, stakeholder feedback</li> </ul>                  | EPC Contractor |

| POTENTIAL IMPACTS                        | RECEPTOR                                    | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | MONITORING                                                                                                                          | RESPONSIBILITY |
|------------------------------------------|---------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                                          |                                             | <ul style="list-style-type: none"> <li>• Provide targeted communication and outreach where necessary.</li> <li>• Monitor potential disproportionate impacts on vulnerable groups.</li> <li>• Ensure equal access to employment opportunities, information disclosure, and grievance mechanisms.</li> <li>• Incorporate non-discrimination requirements into contractor management systems.</li> </ul>                                                                                                                                          |                                                                                                                                     |                |
| Grievance Mechanism and Access to Remedy | Workers and surrounding communities         | <ul style="list-style-type: none"> <li>• Establish separate but integrated worker and community grievance mechanisms.</li> <li>• Allow anonymous submission of grievances.</li> <li>• Ensure grievances are recorded, tracked, investigated, and resolved within defined timeframes.</li> <li>• Communicate grievance procedures regularly to workers and communities.</li> <li>• Monitor grievance trends and implement corrective actions where recurring issues are identified.</li> <li>• Enforce a non-retaliation commitment.</li> </ul> | <ul style="list-style-type: none"> <li>• Grievance logs, tracking database, stakeholder feedback</li> </ul>                         | EPC Contractor |
| Security Personnel and Use of Force      | Workers, visitors, nearby community members | <ul style="list-style-type: none"> <li>• Develop and implement a Security Management Plan consistent with IFC Good Practice Handbook on the Use of Security Forces.</li> <li>• Train security personnel on human rights, appropriate conduct, and proportional use of force.</li> </ul>                                                                                                                                                                                                                                                        | <ul style="list-style-type: none"> <li>• Security personnel conduct and incidents involving use of force or intimidation</li> </ul> | EPC Contractor |

| POTENTIAL IMPACTS                              | RECEPTOR                                                                                                                                                     | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | MONITORING                                                                                                      | RESPONSIBILITY |
|------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|----------------|
|                                                |                                                                                                                                                              | <ul style="list-style-type: none"> <li>Implement a Code of Conduct for security personnel.</li> <li>Establish procedures for reporting and investigating security-related incidents.</li> <li>Maintain oversight of any third-party security providers.</li> <li>Ensure community members can raise concerns regarding security personnel behaviour through the grievance mechanism.</li> </ul>                                                                                                                                                                                                                |                                                                                                                 |                |
| Supply Chain and Contractor Human Rights Risks | Workers employed by subcontractors, migrant and temporary workers, employees of labour agencies, workers in material production and transport supply chains. | <ul style="list-style-type: none"> <li>Incorporate human rights requirements into procurement and contractor agreements.</li> <li>Conduct due diligence and screening of contractors, subcontractors, labour agencies, and key suppliers.</li> <li>Undertake periodic audits of labour practices and working conditions.</li> <li>Require contractors to comply with Project labour, human rights, and OHS requirements.</li> <li>Establish corrective action procedures for non-compliance.</li> <li>Monitor high-risk supply chains for child labour, forced labour, and worker welfare concerns.</li> </ul> | <ul style="list-style-type: none"> <li>Supplier audits, procurement records, third-party assessments</li> </ul> | EPC Contractor |

## 6.2 Operation Phase Mitigation and Monitoring

### 6.2.1 Air Quality

| POTENTIAL IMPACTS          | RECEPTOR                     | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | MONITORING                                                                                                                                                                                                                                                                                                            | RESPONSIBILITY |
|----------------------------|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| VOCs and gaseous emissions | Nearby residential Community | <ul style="list-style-type: none"> <li>The backup generators will be used only during emergency grid blackouts and briefly during testing situations and maintenance.</li> <li>Unnecessary usage of vehicles and equipment will be minimised, and unnecessary idling of vehicles will be avoided.</li> <li>Exhaust fumes and particulates emitted from trucks and vehicles will be minimised by ensuring the use of good condition vehicles (e.g., compliant to vehicle emission requirements).</li> <li>Lorries and truck engines will be turned off while waiting on site to minimise gaseous emissions.</li> <li>Volatile fuels and chemicals (including hazardous wastes) will be stored in sealed containers with a secondary containment.</li> <li>Leak detection systems to be installed for bulk volatile fuels and chemicals stored on-site, where applicable. This requirement does not apply to small containers or drums stored in designated chemical storage areas.</li> <li>Disclosure of the grievance mechanism (GRM) procedure with the external stakeholders and local communities nearby the project plot. Complaints will be addressed in a timely manner as per the project's GRM.</li> </ul> | <ul style="list-style-type: none"> <li>Air emissions monitoring in the event of a complaint about gaseous or particulate emissions is received.</li> <li>Daily visual and olfactory observations – as part of maintenance and inspection checks (for hygiene, safety and appropriate storage/containment).</li> </ul> | FM Co.         |

| POTENTIAL IMPACTS                                 | RECEPTOR                     | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | MONITORING                                                                                                                                                                                                                                                                                                            | RESPONSIBILITY |
|---------------------------------------------------|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Emissions from utility and support infrastructure | Nearby residential Community | <ul style="list-style-type: none"> <li>Use district heating as the primary heat source and keep fuel-oil boiler use strictly as emergency backup.</li> <li>Specify low-sulphur fuel and require good combustion efficiency.</li> <li>Limit boiler operating hours and include them in an emissions log.</li> <li>Provide adequate stack height, discharge velocity and separation from air intakes and receptors.</li> <li>Use electric or low-emission sterilisation systems where feasible.</li> <li>Install kitchen exhaust with grease filtration, adequate stack discharge and routine cleaning.</li> <li>Prefer electrically driven or district-heated laundry systems where possible.</li> </ul> | <ul style="list-style-type: none"> <li>Air emissions monitoring in the event of a complaint about gaseous or particulate emissions is received.</li> <li>Daily visual and olfactory observations – as part of maintenance and inspection checks (for hygiene, safety and appropriate storage/containment).</li> </ul> | FM Co.         |

### 6.2.2 Climate Change

| POTENTIAL IMPACTS                          | RECEPTOR          | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                          | MONITORING                                                                                                        | RESPONSIBILITY |
|--------------------------------------------|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|----------------|
| Increase in GHGs emissions from use of SF6 | Global Atmosphere | <ul style="list-style-type: none"> <li>Use SF6-containing transformers and circuit breakers only where technically necessary and evaluate SF6-free alternatives such as vacuum-based switchgear for future procurement or replacement cycles.</li> <li>Prior to operation, a GHG Management and Reporting Plan will be prepared to implement and monitor control</li> </ul> | <ul style="list-style-type: none"> <li>Records of SF6 purchases, use, losses, and recovered quantities</li> </ul> | FM Co.         |

| POTENTIAL IMPACTS                                 | RECEPTOR          | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | MONITORING                                                                   | RESPONSIBILITY |
|---------------------------------------------------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|----------------|
|                                                   |                   | <p>measures to reduce emission of GHGs on an annual basis.</p> <ul style="list-style-type: none"> <li>• Prepare and implement an SF<sub>6</sub> lifecycle management plan covering inventory, labelling, procurement control, handling, recovery, recycling, and final disposal.</li> <li>• Install and maintain leak detection and repair procedures, including routine inspections, pressure monitoring, and prompt repair of any identified leaks.</li> <li>• Recover SF<sub>6</sub> during maintenance and decommissioning using approved recovery equipment; do not vent gas to atmosphere.</li> <li>• Keep records of SF<sub>6</sub> purchases, use, losses, and recovered quantities, and report these in the project's greenhouse gas inventory.</li> </ul> |                                                                              |                |
| Increase in GHG emissions from back-up generators | Global Atmosphere | <ul style="list-style-type: none"> <li>• Implement the gaseous air emissions mitigation measures.</li> <li>• Regular maintenance of the backup generators so that the initially designed efficiency and emission performance can be maintained.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <ul style="list-style-type: none"> <li>• Air emissions monitoring</li> </ul> | FM Co.         |

### 6.2.3 Noise and Vibration

| POTENTIAL IMPACTS                 | RECEPTOR                     | MITIGATION AND MANAGEMENT MEASURES | MONITORING | RESPONSIBILITY |
|-----------------------------------|------------------------------|------------------------------------|------------|----------------|
| Noise from traffic and occasional | Nearby residential Community |                                    |            | FM Co.         |

| POTENTIAL IMPACTS        | RECEPTOR                                                  | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | MONITORING                                                                                                                                                                                                                                                  | RESPONSIBILITY |
|--------------------------|-----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| use of backup generators |                                                           | <ul style="list-style-type: none"> <li>Install acoustic enclosures or soundproof housings around the backup generators to significantly reduce airborne noise.</li> <li>Fit critical-grade mufflers or silencers on the generator exhaust system to minimize exhaust noise.</li> <li>Use anti-vibration mounts or pads beneath the backup generators to reduce structure-borne noise transmission.</li> <li>Apply sound-absorbing materials (e.g., acoustic panels) on walls and ceilings.</li> <li>Restrict routine testing and maintenance of backup generators to daytime hours only, avoiding early morning or night-time operations.</li> <li>Conduct regular maintenance and tuning of the backup generators to ensure efficient performance and minimize abnormal noise.</li> </ul> | <ul style="list-style-type: none"> <li>Upon receipt of grievances related to noise emissions</li> <li>Indoor noise levels within a representative sample of hospital wards and treatment rooms (<math>L_{eq}(A)</math> and <math>L_{max}</math>)</li> </ul> |                |
|                          | Admitted Hospital Patients                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                             |                |
|                          | Project Operational Workforce – clinical and non-clinical |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                             |                |

#### 6.2.4 Terrestrial Ecology

| POTENTIAL IMPACTS           | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                     | MONITORING                                                                                                                              | RESPONSIBILITY |
|-----------------------------|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Wildlife-Vehicle Collisions | Fauna    | <ul style="list-style-type: none"> <li>Appropriate speed limits shall be maintained on internal Ecocity roads and access routes.</li> <li>Adequate road lighting shall be provided to improve driver visibility while avoiding unnecessary light spill into adjacent areas.</li> </ul> | <ul style="list-style-type: none"> <li>Proper segregation, storage, and disposal of domestic, medical, and hazardous wastes;</li> </ul> | FM Co.         |

| POTENTIAL IMPACTS                         | RECEPTOR                               | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | MONITORING                      | RESPONSIBILITY |
|-------------------------------------------|----------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|----------------|
|                                           |                                        | <ul style="list-style-type: none"> <li>Waste and food residues shall be appropriately managed to avoid attracting birds, mammals, or other wildlife to roads, parking areas.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | evidence of wildlife attraction |                |
| Pollution from Waste and Wastewater       | Adjacent habitats and associated fauna | <ul style="list-style-type: none"> <li>All solid, hazardous, medical waste shall be handled, transported and disposed of in accordance with applicable hospital waste management procedures.</li> <li>Waste shall be stored in designated, secure, and covered facilities to prevent leakage, wind dispersal, scavenging by animals, and attraction of pest species.</li> <li>Wastewater generated by the hospital shall be collected and treated in accordance with standard procedures and good practices.</li> </ul>                                                                                                                                                                                                                                                                  |                                 |                |
| Attraction of Pest and Synanthropic Fauna | Native fauna                           | <ul style="list-style-type: none"> <li>All food waste, municipal waste, and other potentially attractive waste shall be stored in covered, animal-proof containers and removed from the site regularly.</li> <li>Good housekeeping practices shall be maintained throughout the operational phase to prevent the accumulation of food waste, litter, or other materials that may attract feral dogs, feral cats, rodents, or opportunistic bird species.</li> <li>Routine inspections of the hospital premises shall be undertaken to identify the presence of pest species or increasing numbers of feral animals, and appropriate pest management measures shall be implemented where required in accordance with applicable regulations and animal welfare considerations.</li> </ul> |                                 |                |

## 6.2.5 Water Resources

| POTENTIAL IMPACTS           | RECEPTOR    | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | MONITORING                                                                                                                 | RESPONSIBILITY |
|-----------------------------|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|----------------|
| Stormwater Runoff           | Groundwater | <ul style="list-style-type: none"> <li>FM Company shall develop and implement an Emergency Response Plan (ERP) to include or link to a Spill Response and Contingency Plan.</li> <li>Appropriate training of staff in regard to the handling and response to spill/leak events.</li> <li>Fuel tanks monitoring system shall be operational at all times and any leak detected shall be immediately stopped with applicable correction measures implemented.</li> <li>Storage of all hazardous materials such as fuels and chemicals on an impermeable base with liners and/or secondary containment bund with enough capacity to hold 110% of the bulk storage container and 25% of the total volume of the multiple containers.</li> <li>All spills and leaks will be reported promptly and investigated to confirm the cause and put in place appropriate corrective/preventative actions. The spill or leaks incidents will be documented with evidence of investigation and close out.</li> <li>Restrict access to hazardous materials.</li> <li>Availability of complete spill kits in all hazardous material storage areas.</li> <li>Availability of MSDS on-site for any chemicals in use (to be made available at the chemical storage area).</li> <li>Availability of a chemical register for all the hazardous chemicals on site.</li> </ul> | <ul style="list-style-type: none"> <li>Daily inspections to detect Visible spills and leaks of chemicals/ waste</li> </ul> | FM Co.         |
| Accidental Spills and Leaks |             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                            |                |

## 6.2.6 Topography, Geology, and Soil

| POTENTIAL IMPACTS                                   | RECEPTOR     | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | MONITORING                                                                                                                                                                                                                                                            | RESPONSIBILITY |
|-----------------------------------------------------|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Soil Contamination from Fuel Storage                | Soil quality | <ul style="list-style-type: none"> <li>Segregate stormwater from potentially contaminated areas.</li> <li>Implement spill response protocols, including ready access to spill kits, absorbents, and trained personnel.</li> <li>Conduct regular inspections of fuel storage and chemical storage areas.</li> <li>Store all chemicals in secondary containment systems (e.g., bunded areas or lined storage pads).</li> <li>Apply proper handling procedures, training staff on safe use, storage, and disposal of chemicals.</li> <li>Monitor soil near fuel storage and chemical handling areas for early detection of contamination.</li> </ul>                                          | <ul style="list-style-type: none"> <li>Periodic visual inspections of the fuel storage, chemical storage area, and waste handling area to be done on unpaved and landscaped areas, hazardous and fuel storage, drainage channels, and waste handling areas</li> </ul> | FM Co.         |
| Impacts associated with waste handling and disposal |              | <ul style="list-style-type: none"> <li>Store all hazardous wastes in designated, paved, and bunded areas with secondary containment to prevent infiltration to soil.</li> <li>Ensure hazardous waste storage areas are covered and clearly labelled, with impermeable flooring and spill containment systems.</li> <li>Implement spill prevention and emergency response procedures specific to waste handling areas.</li> <li>Arrange for regular collection and off-site treatment or disposal by licensed waste contractors in accordance with national regulations.</li> <li>Develop and implement a Waste Management Plan in line with IFC EHS Guidelines, detailing waste</li> </ul> |                                                                                                                                                                                                                                                                       |                |

| POTENTIAL IMPACTS | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                     | MONITORING | RESPONSIBILITY |
|-------------------|----------|------------------------------------------------------------------------|------------|----------------|
|                   |          | classification, storage, handling, transport, and disposal procedures. |            |                |

### 6.2.7 Solid Waste and Wastewater

| POTENTIAL IMPACTS                                             | RECEPTOR                                                                                                                                                                                           | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | MONITORING                                                                                                                                                                                                                                                                                                                                                                                                                                                 | RESPONSIBILITY |
|---------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Generation and improper management of medical hazardous waste | <ul style="list-style-type: none"> <li>Waste infrastructure within Fergana Region</li> <li>Residential Communities</li> <li>Licensed waste transport operators</li> <li>Water resources</li> </ul> | <ul style="list-style-type: none"> <li>Implement strict waste segregation at point of generation based on the class and type of medical waste.</li> <li>Medical waste to be disposed of in designated colour-coded and labelled containers according to its type and class. Containers must be leak-proof and puncture-resistant for sharps and infectious waste.</li> <li>Seal waste containers when three-quarters full</li> <li>Transport waste within the facility using designated routes and dedicated trolleys that are not used for other purposes</li> <li>Designate a secure, ventilated, access-controlled interim waste storage area on-site, separate from food storage, patient areas, and public access zones</li> <li>Limit on-site storage duration: infectious waste not to exceed 24 hours at ambient temperature or 72-hours under refrigeration</li> <li>Maintain on-site storage areas in clean condition; disinfect regularly</li> <li>Apply the treatment method appropriate to each waste class</li> </ul> | <ul style="list-style-type: none"> <li>Number of grievances from waste management service providers and/ or affected communities and commercial/ industrial establishments with regards to disruption of waste management services</li> <li>Volume of generated waste (medical and domestic waste)</li> <li>Inspect and monitor proper handling and storing of waste materials.</li> <li>Check storage areas containment and control procedures</li> </ul> | FM Co.         |

| POTENTIAL IMPACTS | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | MONITORING                                                                                                                                                                                                                                       | RESPONSIBILITY |
|-------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
|                   |          | <ul style="list-style-type: none"> <li>• Use only licensed waste contractors with documented authorisation for the specific waste class being transported (as approved by MoH)</li> <li>• Require waste transport vehicles to meet applicable standards for infectious or hazardous waste transport; vehicles must be enclosed, cleanable, and dedicated to waste transport</li> <li>• Use a waste transfer manifest (consignment note) system for all hazardous waste movements, tracking from point of generation to confirmed disposal</li> <li>• Confirm and document the receiving disposal facility for each waste stream prior to operations; facilities must hold valid operating licenses.</li> <li>• Do not use open dumpsites or non-engineered landfills for any healthcare waste stream. Medical waste shall be treated and managed in MoH authorized treatment facilities only that are suitable for the type of medical waste.</li> <li>• Provide mandatory initial and annual refresher training to all staff -- clinical and non-clinical -- on waste segregation, container handling, spill response, and personal protective equipment use</li> <li>• Conduct waste audits at minimum annually to quantify generation by stream and assess segregation compliance in coordination with MoH.</li> <li>• Maintain records of all waste consignments including type, quantity, contractor, and disposal destination.</li> <li>• Investigate and report all waste-related incidents (spills, segregation failures, contractor non-</li> </ul> | <ul style="list-style-type: none"> <li>• Record keeping of waste transfer notes</li> <li>• Ensuring engaged contractors, their vehicles and waste management facilities have applicable registrations/licenses at time of procurement</li> </ul> |                |

| POTENTIAL IMPACTS                                         | RECEPTOR                                                                                                                                                                                                   | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | MONITORING | RESPONSIBILITY |
|-----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                                                           |                                                                                                                                                                                                            | <p>compliance) within 24 hours; implement corrective actions within 30 days</p> <ul style="list-style-type: none"> <li>• Provide appropriate PPE to all waste handling staff: puncture-resistant gloves, heavy-duty aprons, closed footwear, and eye protection as a minimum</li> <li>• Prohibit manual sorting or handling of unsegregated medical waste</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |            |                |
| Generation and improper management of non-hazardous waste | <ul style="list-style-type: none"> <li>• Waste infrastructure within Fergana Region</li> <li>• Residential Communities</li> <li>• Licensed waste transport operators</li> <li>• Water resources</li> </ul> | <ul style="list-style-type: none"> <li>• Prior to start of operation of the hospital, MoH/M Co. will coordinate with the local municipality and waste receiving facilities to ensure sufficient capacity is available for receiving wastes.</li> <li>• Implement a formal waste minimisation programme with measurable annual reduction targets for general waste streams</li> <li>• Conduct periodic waste composition audits to identify reduction opportunities by department and waste stream</li> <li>• Reduce unnecessary packaging through procurement policy; prioritise suppliers using minimal or recyclable packaging</li> <li>• Implement food waste minimisation measures in catering and kitchen operations, including portion control and demand-based procurement</li> <li>• Substitute single-use items with reusable alternatives where infection control protocols and clinical safety permit</li> <li>• Domestic solid wastes to be segregated and identified from the other hazardous waste streams. Non-</li> </ul> |            | FM Co.         |

| POTENTIAL IMPACTS | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | MONITORING | RESPONSIBILITY |
|-------------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                   |          | <p>hazardous waste must not be co-mingled with infectious; pharmaceutical, chemical, or sharps waste at any stage.</p> <ul style="list-style-type: none"> <li>Waste containers/skips will be clearly labelled and placed in designated waste storage locations. Labels will be waterproof, securely attached, and written different languages, as required.</li> <li>For litter (food waste, domestic waste), an adequate number of covered bins will be strategically placed throughout the site at locations where operational staff consume food. These will be regularly collected and taken to the main waste storage area.</li> <li>Food waste will be stored within a sealed metal or plastic skip or bin, to prevent pests from gaining access.</li> <li>Engage with local recycling contractors or informal sector cooperatives where these are formally recognised and operating</li> <li>Explore opportunities for organic waste composting or controlled biological treatment for food and garden waste where technically feasible and compliant with national sanitary requirements</li> <li>Only licensed waste transporters and waste management facilities will be engaged, and copies of the waste management licenses will be maintained on site.</li> <li>Completed waste manifests will be maintained to show the chain of custody of the waste generated on-site, its</li> </ul> |            |                |

| POTENTIAL IMPACTS                                | RECEPTOR                                                                                                                                                    | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | MONITORING                                                                                                                        | RESPONSIBILITY |
|--------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|----------------|
|                                                  |                                                                                                                                                             | <p>transportation and treatment/disposal. All records will be maintained on-site.</p> <ul style="list-style-type: none"> <li>Prohibit disposal of non-hazardous waste to open dumpsites.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                   |                |
| Generation and improper management of wastewater | <ul style="list-style-type: none"> <li>Wastewater infrastructure within Fergana Region</li> <li>Residential Communities</li> <li>Water resources</li> </ul> | <ul style="list-style-type: none"> <li>Pre-treat hospital wastewater prior to discharge to the municipal sewer network.</li> <li>Separately collect and treat laboratory wastewater, autoclave condensate, and radiopharmaceutical wastewater under specific protocols.</li> <li>Manage domestic wastewater from non-clinical areas (kitchens, laundries, sanitary facilities, administrative areas) in accordance with applicable national discharge standards.</li> <li>Install grease traps on kitchen and catering wastewater discharge lines prior to connection to the sewer to prevent blockage and comply with municipal sewer acceptance standards.</li> <li>Treat laundry wastewater where detergent and surfactant loads are likely to exceed sewer acceptance standards prior to discharge.</li> </ul> | The Hospital will maintain records of all wastewater analysis for inspection of compliance and relating permitting (as required). | FM Co.         |

## 6.2.8 Landscape and Visual

| POTENTIAL IMPACTS                    | RECEPTOR                                           | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | MONITORING                                                                                                              | RESPONSIBILITY |
|--------------------------------------|----------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|----------------|
| Change in Landscape Character        | Receiving Environment                              | <ul style="list-style-type: none"> <li>Only designated access roads will be used.</li> <li>Good housekeeping will be implemented across the site.</li> <li>Lighting will be managed to avoid light spill.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | -                                                                                                                       | FM Co.         |
| Reduction in Visual Amenity          | Nearby Receptors                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                         |                |
| Visual impacts on airport operations | Fergana International Airport – Aircraft Operators | <ul style="list-style-type: none"> <li>Design and install the rooftop Solar PV system in accordance with applicable national regulations, GIIP, and the Project's engineering design requirements to minimise the potential for glint and glare.</li> <li>Consider the use of PV modules and associated equipment with low-reflectance or anti-reflective finishes, where practicable, to minimise reflected light.</li> <li>Optimise the orientation, tilt and layout of the PV array during detailed design to minimise potential glint and glare towards nearby sensitive receptors, including the Airport.</li> <li>Coordinate with the UZCAA and the airport operator, where required, to confirm that the proposed PV installation does not adversely affect aircraft operations, pilot visibility or air traffic control sightlines.</li> <li>Maintain the PV system in accordance with the manufacturer's recommendations to ensure continued safe operation and minimise the potential for unintended reflective effects.</li> </ul> | Visual inspections for evidence of excessive glare, complaints received, and any reported impacts to airport operations | FM Co.         |

| POTENTIAL IMPACTS | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                  | MONITORING | RESPONSIBILITY |
|-------------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                   |          | <ul style="list-style-type: none"> <li>Develop and implement a procedure for recording, investigating and responding to any complaints or incidents relating to glint and glare, including liaison with the airport operator and relevant authorities where appropriate.</li> </ul> |            |                |

## 6.2.9 Traffic and Transportation

| POTENTIAL IMPACTS                       | RECEPTOR            | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | MONITORING                                                                                                                                                                                                                                                          | RESPONSIBILITY |
|-----------------------------------------|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Increased vehicular flow and congestion | Road Infrastructure | <ul style="list-style-type: none"> <li>Appoint a suitably qualified traffic and transportation consultant during the detailed design stage to prepare a Traffic and Transport study. Incorporate the recommendations of the study into the final Project design, as appropriate.</li> <li>Coordinate with the Fergana Eco City developer during the detailed design stage to ensure the hospital access arrangements are integrated with the wider Masterplan road network and planned transport infrastructure.</li> <li>Develop and implement an Operational Traffic Management Plan (TMP) prior to commencement of hospital operations. The TMP shall include vehicle routing, internal traffic circulation, parking management, delivery scheduling, pedestrian safety measures, emergency access arrangements, incident management procedures, and monitoring of traffic-related complaints.</li> <li>Provide adequate on-site parking, designated drop-off/pick-up areas, and clearly signed internal circulation</li> </ul> | <ul style="list-style-type: none"> <li>Traffic congestion, vehicle queuing and parking occupancy</li> <li>Road traffic incidents involving hospital-related vehicles</li> <li>Community and road user complaints relating to traffic, parking and access</li> </ul> | FM Co.         |

| POTENTIAL IMPACTS | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | MONITORING | RESPONSIBILITY |
|-------------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                   |          | <p>routes to minimise conflicts between ambulances, visitors, staff and service vehicles.</p> <ul style="list-style-type: none"> <li>• Ensure emergency vehicle access and ambulances routes remain unobstructed at all times.</li> <li>• Coordinate deliveries, servicing activities, waste collection, laundry services, and other operational logistics. This would include designated delivery routes, loading and unloading areas, delivery schedules, and measures to minimise traffic congestion and conflicts with patient, visitor, and emergency vehicle movements.</li> <li>• Schedule routine deliveries, servicing activities, and waste collection outside of peak patient and visitor periods, where practicable, to minimise traffic congestion and maintain safe and efficient access to the hospital.</li> <li>• Develop and implement emergency traffic management procedures, including contingency measures to maintain uninterrupted emergency access during periods of traffic congestion or other disruptions.</li> </ul> |            |                |

#### 6.2.10 Socio-economic

| POTENTIAL IMPACTS                      | RECEPTOR                                                  | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                          | MONITORING                                                                                                              | RESPONSIBILITY |
|----------------------------------------|-----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|----------------|
| Improved access to healthcare services | Patients, neighbouring communities, Fergana City, and the | <ul style="list-style-type: none"> <li>• Operate the hospital in accordance with applicable national healthcare legislation and recognised healthcare standards.</li> </ul> | <ul style="list-style-type: none"> <li>• Patient satisfaction levels</li> <li>• Number of patient complaints</li> </ul> | MoH            |

| POTENTIAL IMPACTS                          | RECEPTOR                                                        | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | MONITORING                                                                                                                                                                                                                                     | RESPONSIBILITY                                                                                     |
|--------------------------------------------|-----------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
|                                            | Fergana Region population                                       | <ul style="list-style-type: none"> <li>Provide specialised tertiary healthcare services to meet regional healthcare needs.</li> <li>Monitor service delivery, patient safety and quality of care to support continual improvement.</li> <li>Establish and maintain patient feedback mechanisms.</li> </ul>                                                                                                                                                                                                                                                                                                                                                    | <ul style="list-style-type: none"> <li>Average patient waiting times</li> <li>Hospital bed occupancy rates</li> </ul>                                                                                                                          |                                                                                                    |
| Equitable access to healthcare services    | Patients, vulnerable groups                                     | <ul style="list-style-type: none"> <li>Establish transparent patient admission and referral procedures.</li> <li>Ensure healthcare services and facilities are accessible to persons with disabilities and other vulnerable groups.</li> <li>Provide clear and accessible information on available healthcare services, eligibility and referral requirements.</li> <li>Promote equitable access to healthcare services, including affordability where applicable under the national healthcare system.</li> <li>Establish and maintain patient feedback and community grievance mechanisms to identify and address barriers to healthcare access.</li> </ul> | <ul style="list-style-type: none"> <li>Number of accessibility complaints</li> <li>Number of grievances relating to healthcare access</li> <li>Patient satisfaction by service type</li> <li>Number of vulnerable patients assisted</li> </ul> | MoH                                                                                                |
| Long-term employment and economic benefits | Local workforce, local businesses, suppliers, service providers | <ul style="list-style-type: none"> <li>Implement transparent and non-discriminatory recruitment procedures.</li> <li>Undertake workforce planning and skills assessment prior to operation to assess the availability of suitably qualified clinical and non-clinical personnel within Fergana Region and identify any critical skills gaps.</li> <li>Collaborate with regional healthcare education institutions, including the Fergana Medical Institute of</li> </ul>                                                                                                                                                                                      | <ul style="list-style-type: none"> <li>Number and % of local employees</li> <li>Number and % of local suppliers</li> <li>Value of procurement awarded locally</li> </ul>                                                                       | SPV-Project Company (limited to building management staff under the FM Co. and its subcontractors) |

| POTENTIAL IMPACTS           | RECEPTOR                                                | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | MONITORING                                                                                                                                                                                                                   | RESPONSIBILITY                           |
|-----------------------------|---------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
|                             |                                                         | <p>Public Health and vocational training institutions, to promote graduate recruitment, internships and work-integrated learning opportunities.</p> <ul style="list-style-type: none"> <li>• Prioritise local employment and procurement where suitably qualified personnel and suppliers are available to maximise socio-economic benefit for surrounding communities.</li> <li>• Promote opportunities for women-owned enterprises and local women's producer groups through the procurement of goods and services. This should include consideration of local textile and garment manufacturers and women engaged in tailoring and clothmaking to supply hospital uniforms, linen and other non-clinical textile products, where they meet the required quality, technical and procurement standards.</li> <li>• Promote workforce development through ongoing training and professional development.</li> <li>• Monitor local employment and procurement performance throughout the operation.</li> </ul> |                                                                                                                                                                                                                              | FM Co. (limited to clinical staff)       |
| Community health and safety | Patients, visitors, employees, neighbouring communities | <ul style="list-style-type: none"> <li>• Establish and implement a Community Health and Safety Management Plan.</li> <li>• Implement access control, visitor management and site security procedures.</li> <li>• Implement healthcare waste management procedures to protect workers, neighbouring communities and the environment.</li> <li>• Maintain emergency preparedness and response procedures.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>• Number of community complaints</li> <li>• Number of security incidents</li> <li>• Number of emergency response incidents</li> <li>• Number of healthcare waste incidents</li> </ul> | <p>SPV-Project Company</p> <p>FM Co.</p> |

| POTENTIAL IMPACTS | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                                                                                               | MONITORING              | RESPONSIBILITY |
|-------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|----------------|
|                   |          | <ul style="list-style-type: none"> <li>Establish and maintain stakeholder engagement and an accessible community grievance mechanism.</li> </ul> | affecting the community |                |

### 6.2.11 Community Health and Safety

| POTENTIAL IMPACTS                                        | RECEPTOR                                                                          | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | MONITORING                                                                                                                                                                                                                                                                                                                                                                                                    | RESPONSIBILITY                                                                                                                                                                                  |
|----------------------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Improved Access to Healthcare and Public Health Benefits | Residents of Fergana Region, vulnerable groups, patients, healthcare institutions | <ul style="list-style-type: none"> <li>Ensure the hospital operates in accordance with national healthcare regulations and international good practice standards.</li> <li>Maintain sufficient staffing levels, equipment availability, and operational capacity to provide continuous tertiary healthcare services.</li> <li>Establish transparent patient referral systems and emergency response procedures.</li> <li>Ensure equitable access to healthcare services regardless of gender, age, disability, ethnicity, or socio-economic status.</li> <li>Maintain accreditation and certification requirements in accordance with Ministry of Health requirements and lender expectations.</li> <li>Implement community outreach and health awareness programmes focusing on preventative healthcare, maternal health, communicable disease prevention, and vulnerable populations.</li> </ul> | <ul style="list-style-type: none"> <li>Community perceptions regarding Project health, safety, security, access, and overall Project performance through stakeholder feedback and engagement records.</li> <li>Number of awareness programmes undertaken on road safety, communicable diseases, emergency preparedness, waste management, public safety, GBVH prevention, and grievance mechanisms</li> </ul> | <p>MoH (limited to clinical services and patient related services)</p> <p>SPV-Project Company (limited to community related services)</p> <p>FM Co. (limited to community related services)</p> |

| POTENTIAL IMPACTS               | RECEPTOR                                                                             | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | MONITORING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | RESPONSIBILITY                           |
|---------------------------------|--------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
|                                 |                                                                                      | <ul style="list-style-type: none"> <li>Establish telemedicine and medical education programmes to strengthen regional healthcare capacity.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                          |
| Traffic and Road Safety Impacts | Patients, visitors, staff, ambulance users, local residents, road users, pedestrians | <ul style="list-style-type: none"> <li>Develop and implement an Operational Traffic Management Plan covering staff traffic, ambulance movements, deliveries, visitor access, parking management, and emergency vehicle priority routes.</li> <li>Designate separate access routes and circulation areas for ambulances, service vehicles, visitors, and staff where feasible.</li> <li>Install and maintain road safety infrastructure including signage, pedestrian crossings, speed-calming measures, traffic signals, lighting, and directional systems.</li> <li>Provide dedicated drop-off and pick-up areas to minimise congestion.</li> <li>Implement parking management systems to prevent overspill parking into surrounding communities.</li> <li>Conduct periodic road safety audits and coordinate with Eco City authorities regarding cumulative traffic management.</li> <li>Undertake public awareness campaigns on road safety around hospital access areas.</li> <li>Maintain emergency access routes free of obstruction at all times.</li> </ul> | <ul style="list-style-type: none"> <li>Number of vehicle movements, compliance with designated haul routes, speed limits, traffic control measures, and driver requirements</li> <li>Number and severity of road traffic accidents, near misses, pedestrian incidents, vehicle collisions, and emergency vehicle-related incidents involving Project activities</li> <li>Compliance status of road signage, traffic calming measures, pedestrian crossings, lighting, traffic marshals, and access controls</li> </ul> | <p>SPV-Project Company</p> <p>FM Co.</p> |

| POTENTIAL IMPACTS                                         | RECEPTOR                                                                      | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | MONITORING                                                                                                                                                                                                                                                                                                                      | RESPONSIBILITY                           |
|-----------------------------------------------------------|-------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
| Healthcare Waste and Hazardous Materials Management Risks | Nearby communities, waste handlers, transport contractors, patients, visitors | <ul style="list-style-type: none"> <li>Develop and implement a Healthcare Waste Management Plan (HCWMP) consistent with WBG EHS Guidelines for Health Care Facilities.</li> <li>Develop and implement a Hazardous Materials Management Plan covering procurement, transport, storage, use, and disposal of chemicals and medical gases.</li> <li>Segregate waste at source using colour-coded systems for infectious, pathological, pharmaceutical, chemical, sharps, recyclable, and general waste streams.</li> <li>Provide secure, ventilated, and access-controlled waste storage facilities.</li> <li>Ensure collection, transportation, treatment, and disposal are undertaken by licensed and authorised contractors and facilities.</li> <li>Establish documented chain-of-custody procedures for hazardous and infectious waste.</li> <li>Conduct routine inspections and audits of waste management systems.</li> <li>Train all relevant staff and contractors on healthcare waste handling procedures and emergency response requirements.</li> <li>Maintain contingency measures in the event of treatment facility failure or waste transport disruption.</li> </ul> | <ul style="list-style-type: none"> <li>Compliance with waste segregation, storage, transportation, treatment, disposal, and manifest tracking requirements.</li> <li>Quantities of hazardous substances stored and used, inventory tracking, storage inspections, and compliance with hazardous materials procedures</li> </ul> | <p>SPV-Project Company</p> <p>FM Co.</p> |
| Infection Control and                                     | Patients, visitors, healthcare workers,                                       | <ul style="list-style-type: none"> <li>Implement a comprehensive Infection Prevention and Control (IPC) Programme aligned with WHO guidance and national healthcare requirements.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <ul style="list-style-type: none"> <li>Number of awareness programmes undertaken on communicable</li> </ul>                                                                                                                                                                                                                     | MoH (limited to clinical services and    |

| POTENTIAL IMPACTS                                        | RECEPTOR                                           | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | MONITORING                                                                                                                                                                                                                                       | RESPONSIBILITY                                                                                                                                            |
|----------------------------------------------------------|----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| Communicable Disease Risks                               | surrounding communities                            | <ul style="list-style-type: none"> <li>Establish infection surveillance systems for healthcare-associated infections (HAIs).</li> <li>Maintain isolation facilities, quarantine procedures, and outbreak response protocols.</li> <li>Ensure availability and use of appropriate personal protective equipment (PPE).</li> <li>Implement hand hygiene programmes, sterilisation procedures, and environmental cleaning standards.</li> <li>Develop pandemic and epidemic preparedness plans integrated with regional health authorities.</li> <li>Conduct regular IPC training and competency assessments for clinical and non-clinical staff.</li> <li>Undertake routine monitoring and reporting of infection control performance indicators.</li> </ul> | diseases and emergency preparedness.                                                                                                                                                                                                             | <p>patient related services)</p> <p>SPV-Project Company (limited to community related services)</p> <p>FM Co. (limited to community related services)</p> |
| Emergency Preparedness and Critical Infrastructure Risks | Patients, visitors, staff, surrounding communities | <ul style="list-style-type: none"> <li>Develop and implement a comprehensive Emergency Preparedness and Response Plan (EPRP) covering fire, explosion, medical gas incidents, hazardous material releases, natural hazards, and utility failures.</li> <li>Install and maintain fire detection, alarm, suppression, smoke extraction, and emergency communication systems.</li> <li>Maintain backup power systems (EDGs), emergency water supplies, and critical infrastructure redundancy.</li> <li>Conduct routine emergency drills involving hospital personnel, contractors, emergency services, and relevant authorities.</li> </ul>                                                                                                                  | <ul style="list-style-type: none"> <li>Number of emergency drills conducted, including fire, hazardous materials incidents, medical emergencies, disease outbreaks, utility failures, security incidents, and mass casualty scenarios</li> </ul> | <p>SPV-Project Company</p> <p>FM Co.</p>                                                                                                                  |

| POTENTIAL IMPACTS                    | RECEPTOR                                                       | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | MONITORING                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | RESPONSIBILITY                           |
|--------------------------------------|----------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
|                                      |                                                                | <ul style="list-style-type: none"> <li>Establish mutual aid arrangements with local emergency response agencies.</li> <li>Implement preventive maintenance programmes for all critical systems.</li> <li>Develop mass casualty and surge-capacity response procedures.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                          |
| Security and Controlled Access Risks | Patients, visitors, surrounding communities, vulnerable groups | <ul style="list-style-type: none"> <li>Develop and implement a Hospital Security Management Plan consistent with IFC PS4 and the IFC Good Practice Handbook on the Use of Security Forces.</li> <li>Maintain trained security personnel operating under a Code of Conduct consistent with human rights principles.</li> <li>Implement controlled access systems, visitor management procedures, and identification protocols.</li> <li>Install CCTV systems, perimeter lighting, access control systems, and emergency communication mechanisms.</li> <li>Ensure security personnel receive training on conflict management, de-escalation, GBVH/SEA/SH awareness, and grievance handling.</li> <li>Maintain incident reporting and investigation procedures integrated with the Project GRM.</li> <li>Conduct regular security risk assessments and audits</li> </ul> | <ul style="list-style-type: none"> <li>Number of unauthorised access incidents, trespassing events, perimeter breaches, and public access violations recorded</li> <li>Number and type of security incidents including theft, vandalism, trespass, public disorder, threats, violence, intimidation, or conflict involving Project personnel or community members</li> <li>Percentage of security personnel trained in human rights, use of force, conflict de-escalation, grievance handling, stakeholder</li> </ul> | <p>SPV-Project Company</p> <p>FM Co.</p> |

| POTENTIAL IMPACTS                      | RECEPTOR                                                                                      | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | MONITORING                                                                                                                                                                                                                                                                                                                                                                                                                                                 | RESPONSIBILITY                           |
|----------------------------------------|-----------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
|                                        |                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p>engagement, and GBVH awareness</p> <ul style="list-style-type: none"> <li>Number of reported incidents involving use of force, allegations of misconduct, human rights complaints, or community concerns related to security personnel.</li> </ul>                                                                                                                                                                                                      |                                          |
| Vulnerable Groups and Equity of Access | Women, children, elderly persons, persons with disabilities, vulnerable patients and visitors | <ul style="list-style-type: none"> <li>Implement and enforce a GBVH/SEA/SH Prevention and Response Framework applicable to all hospital staff, contractors, visitors, and service providers.</li> <li>Maintain a zero-tolerance policy towards harassment, discrimination, abuse, and retaliation.</li> <li>Provide mandatory training to all staff on GBVH/SEA/SH prevention, safeguarding, patient rights, and respectful treatment.</li> <li>Establish confidential and survivor-centred reporting mechanisms.</li> <li>Ensure referral pathways to medical, psychosocial, legal, and social support services.</li> <li>Maintain adequate lighting, security coverage, and safe waiting areas throughout the facility.</li> <li>Conduct periodic audits and monitoring of safeguarding measures</li> </ul> | <ul style="list-style-type: none"> <li>Number of consultations undertaken with women, elderly persons, persons with disabilities, low-income households, youth, and other vulnerable groups identified in the ESIA</li> <li>Number of GBVH, SEA, SH, harassment, discrimination, or exploitation complaints reported, investigated, referred, and closed in accordance with survivor-centred procedures</li> <li>Number of awareness programmes</li> </ul> | <p>SPV-Project Company</p> <p>FM Co.</p> |

| POTENTIAL IMPACTS                           | RECEPTOR                                            | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | MONITORING                                                                                                                                                                                                                          | RESPONSIBILITY                                                                                                               |
|---------------------------------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|
|                                             |                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | undertaken on GBVH prevention, and grievance mechanisms                                                                                                                                                                             |                                                                                                                              |
| Community Exposure to Operational Nuisances | Eco City residents, nearby developments, visitors   | <ul style="list-style-type: none"> <li>Maintain preventive maintenance programmes for HVAC systems, generators, boilers, and mechanical equipment.</li> <li>Install acoustic attenuation measures where required.</li> <li>Restrict non-emergency deliveries to designated hours where practicable.</li> <li>Maintain enclosed waste storage facilities and regular waste collection schedules to minimise odour generation.</li> <li>Implement lighting designs that minimise unnecessary light spill beyond the hospital boundary.</li> <li>Monitor and respond to community complaints through the Project GRM.</li> </ul> | <ul style="list-style-type: none"> <li>Number of complaints related to noise, odours, traffic, waste handling, visual impacts, and other nuisance effects.</li> </ul>                                                               | <p>SPV-Project Company</p> <p>FM Co.</p>                                                                                     |
| Occupational–Community Interface Risks      | Patients, visitors, healthcare workers, contractors | <ul style="list-style-type: none"> <li>Implement visitor management procedures and access controls for clinical and restricted areas.</li> <li>Clearly segregate public, clinical, service, and emergency response zones.</li> <li>Provide clear wayfinding signage and information systems throughout the hospital.</li> <li>Maintain adequate staffing and crowd management procedures during peak demand periods.</li> <li>Ensure routine inspection and maintenance of public areas to prevent slips, trips, falls, and other hazards.</li> </ul>                                                                         | <ul style="list-style-type: none"> <li>Number and type of community-related incidents, near misses, injuries, illnesses, fatalities, property damage events, or dangerous occurrences attributable to Project activities</li> </ul> | <p>MoH (limited to clinical services and patient related services)</p> <p>FM Co. (limited to community related services)</p> |

| POTENTIAL IMPACTS | RECEPTOR | MITIGATION AND MANAGEMENT MEASURES                                                                                      | MONITORING | RESPONSIBILITY |
|-------------------|----------|-------------------------------------------------------------------------------------------------------------------------|------------|----------------|
|                   |          | <ul style="list-style-type: none"> <li>Maintain incident reporting systems and corrective action procedures.</li> </ul> |            |                |

### 6.2.12 Labour and Working Conditions

| POTENTIAL IMPACTS                    | RECEPTOR                                                                                       | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | MONITORING                                                                                                                                                                                                                                                                                                                                                                                                               | RESPONSIBILITY                                                                                                                                                                        |
|--------------------------------------|------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Employment and Workforce Composition | Direct employees, contracted service providers, healthcare professionals, administrative staff | <ul style="list-style-type: none"> <li>Develop and implement a Human Resources Management System (HRMS), including labour management procedures, aligned with IFC PS2, EBRD PR2/ESR2, DFC requirements, and applicable Uzbekistan labour legislation.</li> <li>Establish transparent, merit-based, and non-discriminatory recruitment and selection procedures, supported by documented criteria and equal opportunity provisions.</li> <li>Prioritise local recruitment where suitably qualified candidates are available and meet job requirements.</li> <li>Ensure all workers are provided with written employment contracts in a language they understand, clearly outlining key terms and conditions of employment.</li> <li>For workers with limited literacy, ensure that employment terms and conditions are communicated verbally in an accessible manner and appropriately documented.</li> </ul> | <ul style="list-style-type: none"> <li>% of workers with written employment contracts.</li> <li>% workers with verified contracts; wage verification; age verification; employment documentation</li> <li>Compliance with wage payment schedules (timeliness and completeness).</li> <li>Records of overtime hours and voluntary consent.</li> <li>Number of labour-related grievances received and resolved.</li> </ul> | <p>MoH (limited to clinical workforce)</p> <p>SPV-Project Company (limited to non-clinical staff and contractors)</p> <p>FM Co. (limited to non-clinical and subcontractor staff)</p> |

| POTENTIAL IMPACTS                    | RECEPTOR                                                                                        | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | MONITORING                                                                                                                                                                                                                                                                                                                                                                           | RESPONSIBILITY                                                                                                                                                                        |
|--------------------------------------|-------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                      |                                                                                                 | <ul style="list-style-type: none"> <li>Clearly communicate wages, benefits, working hours, leave entitlements, and grievance mechanisms to all workers as part of onboarding and ongoing HR processes.</li> <li>Monitor workforce composition, employment conditions, and labour compliance across direct employees and contracted service providers.</li> <li>Conduct periodic audits and inspections of contractors and service providers to ensure compliance with applicable labour standards and contractual requirements.</li> </ul>                                                                                                                                                                                                                                                              | <ul style="list-style-type: none"> <li>Instances of non-compliance identified in audits</li> <li>Ratio of local vs non-local workers.</li> <li>Compliance with Code of Conduct</li> </ul>                                                                                                                                                                                            |                                                                                                                                                                                       |
| Occupational Health and Safety (OHS) | Medical personnel, maintenance staff, cleaners, waste handlers, security personnel, contractors | <ul style="list-style-type: none"> <li>Implement an Occupational Health and Safety Management System consistent with national legislation, IFC PS2, and World Bank Group EHS Guidelines for Healthcare Facilities.</li> <li>Undertake task-specific risk assessments for all hospital activities.</li> <li>Provide mandatory OHS induction and refresher training.</li> <li>Ensure provision and use of appropriate PPE.</li> <li>Implement infection prevention and control (IPC) procedures.</li> <li>Establish protocols for handling sharps, hazardous substances, medical gases, pharmaceuticals, and infectious waste.</li> <li>Maintain emergency preparedness and response procedures including fire safety, medical emergencies, chemical spills, and infectious disease outbreaks.</li> </ul> | <ul style="list-style-type: none"> <li>Lost Time Injury Frequency Rate.</li> <li>Total Recordable Incident Rate.</li> <li>Number of near-miss incidents reported.</li> <li>PPE compliance rates.</li> <li>Number of safety trainings conducted and attendance levels.</li> <li>Findings from inspections and audits.</li> <li>Number of corrective actions closed on time</li> </ul> | <p>MoH (limited to clinical workforce)</p> <p>SPV-Project Company (limited to non-clinical staff and contractors)</p> <p>FM Co. (limited to non-clinical and subcontractor staff)</p> |

| POTENTIAL IMPACTS                           | RECEPTOR                                                                | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | MONITORING                                                                                                                                                                                                                                                                           | RESPONSIBILITY                      |
|---------------------------------------------|-------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
|                                             |                                                                         | <ul style="list-style-type: none"> <li>Conduct regular inspections, audits, incident investigations, and corrective action programmes.</li> <li>Provide occupational health surveillance for high-risk workers.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                      |                                     |
| Working Hours, Shift Work, and Fatigue      | Doctors, nurses, emergency personnel, security staff and shift workers  | <ul style="list-style-type: none"> <li>Establish working hour limits and rostering systems consistent with labour legislation and healthcare sector good practice.</li> <li>Implement fatigue management procedures for critical healthcare functions.</li> <li>Ensure adequate staffing levels to minimise excessive overtime.</li> <li>Provide sufficient rest breaks and shift recovery periods.</li> <li>Monitor overtime and night-shift workloads.</li> <li>Provide psychosocial support and employee wellbeing programmes.</li> <li>Periodically review staffing needs and workforce performance indicators.</li> </ul> | <ul style="list-style-type: none"> <li>Average weekly working hours per worker category</li> <li>Overtime hours and compliance with legal thresholds</li> <li>Wage payment delays (number of cases)</li> <li>Wage deduction complaints</li> <li>Contract compliance rates</li> </ul> | MoH (limited to clinical workforce) |
| Labour Management and Employment Conditions | Security, cleaning, catering, maintenance, waste management contractors | <ul style="list-style-type: none"> <li>Include labour and working condition requirements within all service contracts.</li> <li>Require compliance with Project Labour Management Plan and national labour legislation.</li> <li>Conduct contractor prequalification and labour due diligence.</li> <li>Undertake periodic audits and inspections of contractor performance.</li> </ul>                                                                                                                                                                                                                                        | <ul style="list-style-type: none"> <li>Implementation of retrenchment procedures in line with national labour law and IFC PS2</li> <li>% workers with verified contracts; wage verification; age verification;</li> </ul>                                                            | SPV-Private Company<br><br>FM Co.   |

| POTENTIAL IMPACTS                               | RECEPTOR                                                                            | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                        | MONITORING                                                                                                                                                                                                                                                                                                                                                                                                                                                      | RESPONSIBILITY                                                                                                        |
|-------------------------------------------------|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|
|                                                 |                                                                                     | <ul style="list-style-type: none"> <li>Require contractors to maintain worker grievance mechanisms integrated with the Project Worker Grievance Mechanism.</li> <li>Implement corrective action plans for non-compliance.</li> <li>Maintain contractor performance monitoring records.</li> </ul>                         | <p>employment documentation</p> <ul style="list-style-type: none"> <li>Issuance of prior notice to affected workers</li> <li>Timely payment of wages, severance, and all terminal benefits</li> <li>Provision of employment certificates and work experience documentation</li> <li>Functioning of grievance mechanism for termination-related complaints</li> <li>Compliance of subcontractors with retrenchment and labour transition requirements</li> </ul> |                                                                                                                       |
| Workforce Diversity, Gender, and Discrimination | Women workers, young professionals, disabled persons, migrant and non-local workers | <ul style="list-style-type: none"> <li>Adopt an Equal Opportunity and Non-Discrimination Policy.</li> <li>Ensure recruitment, promotion, remuneration, training, and career progression are based on merit and qualifications.</li> <li>Promote gender balance in clinical, managerial, and support functions.</li> </ul> | <ul style="list-style-type: none"> <li>Ratio of local vs non-local workers.</li> <li>Gender equality, discrimination and GBVH incidents</li> </ul>                                                                                                                                                                                                                                                                                                              | <p>MoH (limited to clinical workforce)</p> <p>SPV-Project Company (limited to non-clinical staff and contractors)</p> |

| POTENTIAL IMPACTS                                                                                            | RECEPTOR                                                                            | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | MONITORING                                                                                                                                                                                                                                                                                                                    | RESPONSIBILITY                                                                                                                                                                        |
|--------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                              |                                                                                     | <ul style="list-style-type: none"> <li>Ensure equal access to training, professional development, and grievance mechanisms.</li> <li>Provide accessible workplace facilities for persons with disabilities.</li> <li>Monitor workforce diversity indicators and address barriers to participation.</li> <li>Conduct periodic awareness training on inclusion and workplace respect.</li> </ul>                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                               | FM Co. (limited to non-clinical and subcontractor staff)                                                                                                                              |
| Gender-Based Violence and Harassment (GBVH), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) | Women workers, young professionals, disabled persons, migrant and non-local workers | <ul style="list-style-type: none"> <li>Implement a zero-tolerance GBVH/SEA/SH Policy.</li> <li>Develop and enforce a Code of Conduct applicable to all workers and contractors.</li> <li>Deliver mandatory awareness and behavioural training.</li> <li>Establish confidential, survivor-centred reporting and grievance mechanisms.</li> <li>Ensure referral pathways to medical, psychosocial, and legal support services.</li> <li>Implement disciplinary procedures for violations.</li> <li>Monitor complaints and response effectiveness while maintaining confidentiality.</li> </ul> | <ul style="list-style-type: none"> <li>Number of GBVH/SEA/SH complaints reported.</li> <li>Percentage of cases resolved within defined timelines.</li> <li>Training coverage on GBVH awareness (%).</li> <li>Disciplinary actions related to misconduct.</li> <li>Functionality of confidential reporting channels</li> </ul> | <p>MoH (limited to clinical workforce)</p> <p>SPV-Project Company (limited to non-clinical staff and contractors)</p> <p>FM Co. (limited to non-clinical and subcontractor staff)</p> |
| Child Labour, Forced Labour and Human Trafficking Risks                                                      | Contracted workers, subcontractor workers and supply chain workers                  | <ul style="list-style-type: none"> <li>Maintain a strict prohibition on child labour, forced labour, debt bondage, and human trafficking. Verify age and identity documentation during recruitment.</li> <li>Prohibit recruitment fees and retention of worker identity documents.</li> </ul>                                                                                                                                                                                                                                                                                                | <ul style="list-style-type: none"> <li>% of workers with verified age documentation</li> <li>Number of recruitment audits conducted</li> </ul>                                                                                                                                                                                | <p>MoH (limited to clinical workforce)</p> <p>SPV-Project Company (limited to</p>                                                                                                     |

| POTENTIAL IMPACTS                                      | RECEPTOR                                                       | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | MONITORING                                                                                                                                                                                                                                                                                                                  | RESPONSIBILITY                                                                                                                                                                        |
|--------------------------------------------------------|----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                        |                                                                | <ul style="list-style-type: none"> <li>Conduct labour due diligence on contractors, labour suppliers, and primary suppliers.</li> <li>Undertake periodic labour audits and inspections.</li> <li>Train HR personnel and contractors on labour exploitation risks.</li> <li>Maintain confidential reporting channels for labour rights concerns.</li> </ul>                                                                                                                                                                                                   | <ul style="list-style-type: none"> <li>Findings from subcontractor labour inspections</li> <li>Incidents of forced labour indicators identified</li> <li>Use of recruitment fees (zero tolerance monitoring)</li> </ul>                                                                                                     | <p>non-clinical staff and contractors)</p> <p>FM Co. (limited to non-clinical and subcontractor staff)</p>                                                                            |
| Worker Welfare, Facilities and Standard of Living      | All Workers                                                    | <ul style="list-style-type: none"> <li>Provide adequate welfare facilities including drinking water, sanitation, changing facilities, rest areas, prayer facilities, and dining areas.</li> <li>Ensure access to occupational health services and first aid.</li> <li>Implement employee wellbeing and mental health programmes.</li> <li>Promote healthy lifestyles and stress management initiatives.</li> <li>Provide access to healthcare services for employees where required.</li> <li>Monitor worker satisfaction and welfare indicators.</li> </ul> | <ul style="list-style-type: none"> <li>Hygiene inspection scores.</li> <li>Availability of potable water, sanitation, and waste facilities.</li> <li>Number of health or safety non-conformities identified.</li> <li>Worker satisfaction feedback results.</li> <li>Incidents of communicable disease outbreaks</li> </ul> | <p>MoH (limited to clinical workforce)</p> <p>SPV-Project Company (limited to non-clinical staff and contractors)</p> <p>FM Co. (limited to non-clinical and subcontractor staff)</p> |
| Exposure to Infectious Diseases and Biological Hazards | Healthcare workers, laboratory staff, cleaners, waste handlers | <ul style="list-style-type: none"> <li>Implement Infection Prevention and Control (IPC) Plans.</li> <li>Provide vaccination programmes where appropriate.</li> <li>Ensure proper segregation, storage, transportation, and disposal of healthcare waste.</li> </ul>                                                                                                                                                                                                                                                                                          | <ul style="list-style-type: none"> <li>Incidents of communicable disease outbreaks</li> </ul>                                                                                                                                                                                                                               | MoH (limited to clinical workforce)                                                                                                                                                   |

| POTENTIAL IMPACTS                                                            | RECEPTOR    | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | MONITORING                                                                                                                                                                                                                                                                                               | RESPONSIBILITY                                                                                                                                                                        |
|------------------------------------------------------------------------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                              |             | <ul style="list-style-type: none"> <li>Provide specialised PPE and training for high-risk staff.</li> <li>Establish outbreak response and disease surveillance procedures.</li> <li>Maintain adequate supplies of infection control materials and emergency stockpiles.</li> <li>Conduct regular compliance monitoring and audits.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                       |
| Worker Grievance Mechanism, Freedom of Association and Collective Bargaining | All workers | <ul style="list-style-type: none"> <li>Respect workers' rights to form or join trade unions and participate in collective bargaining in accordance with national legislation.</li> <li>Ensure no discrimination against worker representatives.</li> <li>Facilitate communication between management and workforce representatives.</li> <li>Provide access to grievance and consultation mechanisms.</li> <li>Maintain records of worker engagement activities.</li> <li>Establish a dedicated Worker Grievance Mechanism accessible to all categories of workers.</li> <li>Allow multiple reporting channels including anonymous submissions.</li> <li>Ensure confidentiality, non-retaliation, and timely resolution.</li> <li>Maintain grievance registers and track corrective actions.</li> <li>Periodically analyse grievance trends to identify systemic issues.</li> </ul> | <ul style="list-style-type: none"> <li>Number of grievances received (by category)</li> <li>% of grievances resolved within agreed timeframe</li> <li>Worker awareness of grievance mechanism (%)</li> <li>Worker representation meetings held</li> <li>Absence of retaliation cases reported</li> </ul> | <p>MoH (limited to clinical workforce)</p> <p>SPV-Project Company (limited to non-clinical staff and contractors)</p> <p>FM Co. (limited to non-clinical and subcontractor staff)</p> |

| POTENTIAL IMPACTS         | RECEPTOR                                           | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | MONITORING                                                                                                                                                                                                                                                                                         | RESPONSIBILITY            |
|---------------------------|----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
|                           |                                                    | <ul style="list-style-type: none"> <li>Communicate outcomes to complainants and workforce representatives.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                    |                           |
| Supply Chain Labour Risks | Primary supply chain workers, contracted suppliers | <ul style="list-style-type: none"> <li>Conduct supply chain labour and human rights due diligence.</li> <li>Assess suppliers for risks relating to child labour, forced labour, GBVH, discrimination, OHS, and poor working conditions.</li> <li>Include labour and human rights requirements in procurement contracts.</li> <li>Undertake supplier audits where high-risk sectors or suppliers are identified.</li> <li>Establish corrective action requirements and supplier improvement plans.</li> <li>Monitor ongoing supplier compliance through periodic reviews and reporting.</li> </ul> | <ul style="list-style-type: none"> <li>% of suppliers screened for labour risks</li> <li>Number of supplier audits conducted</li> <li>Non-compliance findings (child labour, OHS, wages, etc.)</li> <li>Corrective action plan completion rate</li> <li>High-risk supplier list updates</li> </ul> | SPV-Company<br><br>FM Co. |

### 6.2.13 Human Rights

| POTENTIAL IMPACTS                           | RECEPTOR                                                               | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                 | MONITORING                                                                                                                               | RESPONSIBILITY                                                             |
|---------------------------------------------|------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|
| Labour Rights and Decent Working Conditions | Doctors, nurses, paramedics, technicians, administrative staff, FM Co. | <ul style="list-style-type: none"> <li>Implement a Human Resources Management System (HRMS) aligned with IFC PS2 and Uzbekistan Labour Code covering recruitment, contracts, wages, working hours, overtime, and leave.</li> </ul> | <ul style="list-style-type: none"> <li>Employment and labour compliance (contracts, working hours, wages, overtime, benefits)</li> </ul> | MoH (limited to clinical workforce)<br><br>SPV-Project Company (limited to |

| POTENTIAL IMPACTS                                                | RECEPTOR                                                                                                                             | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | MONITORING                                                                                                                                                                                       | RESPONSIBILITY                                                                                             |
|------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
|                                                                  | personnel, contracted service providers                                                                                              | <ul style="list-style-type: none"> <li>Enforce working time controls and shift rotation systems for clinical staff to prevent fatigue and burnout.</li> <li>Establish fatigue management protocols for emergency, ICU, and night-shift personnel.</li> <li>Ensure equal opportunity and non-discrimination policy covering recruitment, promotion, remuneration, and termination.</li> <li>Provide fair wage structures benchmarked to sector standards and reviewed periodically.</li> <li>Guarantee freedom of association and collective bargaining rights in line with national law and ILO principles.</li> <li>Implement worker grievance mechanism with anonymous reporting channels and non-retaliation safeguards.</li> <li>Conduct regular labour audits for FM contractors and subcontractors.</li> </ul> | <ul style="list-style-type: none"> <li>Age verification and prohibition of child labour</li> <li>Forced labour indicators (passport retention, recruitment fees, coercion complaints)</li> </ul> | <p>non-clinical staff and contractors)</p> <p>FM Co. (limited to non-clinical and subcontractor staff)</p> |
| Possible Workforce Transition, Employment and Retrenchment Risks | Employees of existing healthcare institutions potentially affected by organizational restructuring, including non-clinical personnel | <ul style="list-style-type: none"> <li>Develop a Workforce Transition Framework in coordination with the Ministry of Health.</li> <li>Undertake workforce mapping of affected healthcare institutions to understand potential employment impacts.</li> <li>Ensure transparent communication regarding workforce transition arrangements.</li> <li>Apply fair and objective criteria for workforce decisions where required.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                               | -                                                                                                                                                                                                | MoH                                                                                                        |

| POTENTIAL IMPACTS                         | RECEPTOR                                                              | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | MONITORING                                                                                                                                                  | RESPONSIBILITY                                                                                                                                                                        |
|-------------------------------------------|-----------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                           |                                                                       | <ul style="list-style-type: none"> <li>Undertake consultation with potentially affected employees.</li> <li>Provide appropriate notice periods, compensation and referral support in accordance with applicable requirements.</li> <li>Maintain a dedicated grievance mechanism for affected workers.</li> </ul>                                                                                                                                                                                                                                                                         |                                                                                                                                                             |                                                                                                                                                                                       |
| Discrimination, Equality and Inclusion    | Women workers, persons with disabilities, minorities, job applicants  | <ul style="list-style-type: none"> <li>Implement Equal Opportunity and Non-Discrimination Policies.</li> <li>Adopt and enforce a Code of Conduct addressing harassment, discrimination, sexual exploitation, abuse, and GBVH.</li> <li>Conduct mandatory GBVH and respectful workplace training for all workers.</li> <li>Promote equal pay for equal work and fair recruitment practices.</li> <li>Establish confidential reporting and survivor-centred response mechanisms.</li> <li>Monitor workforce composition and participation of women in employment opportunities.</li> </ul> | <ul style="list-style-type: none"> <li>Gender equality, discrimination and GBVH incidents</li> <li>Training completion (human rights, GBVH)</li> </ul>      | <p>MoH (limited to clinical workforce)</p> <p>SPV-Project Company (limited to non-clinical staff and contractors)</p> <p>FM Co. (limited to non-clinical and subcontractor staff)</p> |
| Occupational Health, Safety and Wellbeing | Clinical staff, laboratory staff, waste handlers, maintenance workers | <ul style="list-style-type: none"> <li>Establish a certified Occupational Health &amp; Safety Management System (OHSMS) aligned with ISO 45001.</li> <li>Implement Infection Prevention and Control (IPC) programme, including isolation protocols and PPE requirements.</li> </ul>                                                                                                                                                                                                                                                                                                      | <ul style="list-style-type: none"> <li>Occupational Health &amp; Safety (OHS) performance (incidents, near-misses, PPE use, training completion)</li> </ul> | <p>MoH (limited to clinical workforce)</p> <p>SPV-Project Company (limited to)</p>                                                                                                    |

| POTENTIAL IMPACTS                           | RECEPTOR                              | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | MONITORING                                                                                                                                         | RESPONSIBILITY                                                                                             |
|---------------------------------------------|---------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
|                                             |                                       | <ul style="list-style-type: none"> <li>Provide mandatory vaccinations (e.g., hepatitis, influenza) for clinical and high-risk staff.</li> <li>Conduct biological hazard and sharps injury prevention training.</li> <li>Ensure availability of PPE, hand hygiene stations, and sterilisation systems across all departments.</li> <li>Develop incident reporting, investigation, and corrective action system.</li> <li>Implement medical surveillance and routine health checks for high-risk workers.</li> <li>Provide mental health and psychosocial support programmes (counselling, stress management).</li> </ul>                                                                                                                           |                                                                                                                                                    | <p>non-clinical staff and contractors)</p> <p>FM Co. (limited to non-clinical and subcontractor staff)</p> |
| Patient Rights, Dignity and Quality of Care | Patients, including vulnerable groups | <ul style="list-style-type: none"> <li>Establish a Patient Rights Charter aligned with international healthcare standards.</li> <li>Implement formal informed consent procedures for all medical interventions.</li> <li>Develop clinical governance framework including ethics committees and medical review boards.</li> <li>Train healthcare staff on ethical conduct, confidentiality, and patient dignity.</li> <li>Ensure non-discriminatory access to healthcare services regardless of gender, income, ethnicity, or disability.</li> <li>Implement complaints and feedback system for patients and families, including escalation pathways.</li> <li>Conduct regular patient satisfaction surveys and service quality audits.</li> </ul> | <ul style="list-style-type: none"> <li>Data privacy and confidentiality breaches</li> <li>Patient rights and service quality indicators</li> </ul> | MoH                                                                                                        |

| POTENTIAL IMPACTS                              | RECEPTOR                                                                                                                                                            | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | MONITORING                                                                                                                                 | RESPONSIBILITY                                                                                                                            |
|------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|
| Privacy and Protection of Personal Information | Patients, families, vulnerable patients                                                                                                                             | <ul style="list-style-type: none"> <li>Implement Health Information Management System (HIMS) with role-based access control.</li> <li>Apply data protection policies aligned with international best practice (e.g., GDPR principles as reference).</li> <li>Use encryption, secure servers, and cyber-security firewalls to protect patient data.</li> <li>Restrict access to sensitive medical records on a need-to-know basis only.</li> <li>Conduct cybersecurity audits and penetration testing on IT systems.</li> <li>Train staff on confidentiality obligations and data protection compliance.</li> <li>Establish incident response plan for data breaches, including notification protocols.</li> </ul> | <ul style="list-style-type: none"> <li>Data privacy and confidentiality breaches</li> <li>Training completion (data protection)</li> </ul> | MoH                                                                                                                                       |
| Community Health and Safety                    | Local communities in the Fergana Region, include patients, caregivers, nearby residents, vulnerable groups (elderly, children, and persons with pre-existing health | <ul style="list-style-type: none"> <li>Implement a comprehensive Infection Prevention and Control (IPC) system, including hygiene protocols, patient isolation, staff training, and routine monitoring to reduce communicable disease risks.</li> <li>Establish and enforce healthcare waste management procedures in line with national and international standards, covering segregation, safe storage, transport, treatment, and disposal of infectious and hazardous waste.</li> <li>Develop a site-specific Emergency Preparedness and Response Plan, coordinated with local authorities, to manage outbreaks, mass casualty events, and other public health emergencies.</li> </ul>                         | <ul style="list-style-type: none"> <li>Community health and safety impacts (noise, traffic incidents, complaints)</li> </ul>               | <p>MoH (limited to clinical services and patient related services)</p> <p>SPV-Project Company (limited to community related services)</p> |

| POTENTIAL IMPACTS         | RECEPTOR                                   | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | MONITORING                                                                                                                        | RESPONSIBILITY                                                                                                                                                                                  |
|---------------------------|--------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                           | conditions), and healthcare service users. | <ul style="list-style-type: none"> <li>Apply traffic management and road safety measures, including designated ambulance routes, controlled access zones, signage, speed control, and scheduled vehicle movements to minimise congestion and safety risks.</li> <li>Implement ongoing stakeholder engagement and public communication to keep communities informed about risks, emergency procedures, and access changes.</li> <li>Maintain an accessible grievance mechanism for timely reporting and resolution of community health and safety concerns during operations.</li> </ul> |                                                                                                                                   | FM Co. (limited to community related services)                                                                                                                                                  |
| Security and Human Rights | Patients, visitors, staff, local community | <ul style="list-style-type: none"> <li>Develop a Security Management Plan aligned with IFC Good Practice Handbook on Security Forces.</li> <li>Use trained, licensed security personnel only.</li> <li>Prohibit excessive use of force, discrimination, or intimidation practices.</li> <li>Provide human rights training for security staff (de-escalation, cultural sensitivity).</li> <li>Establish incident reporting and investigation system for security-related complaints.</li> <li>Ensure proportional and non-intrusive security screening procedures.</li> </ul>            | <ul style="list-style-type: none"> <li>Security personnel conduct and incidents involving use of force or intimidation</li> </ul> | <p>MoH (limited to clinical services and patient related services)</p> <p>SPV-Project Company (limited to community related services)</p> <p>FM Co. (limited to community related services)</p> |

| POTENTIAL IMPACTS                         | RECEPTOR                                    | MITIGATION AND MANAGEMENT MEASURES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | MONITORING                                                                                                                           | RESPONSIBILITY                                                                                                                                                  |
|-------------------------------------------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Supply Chain Human Rights Risks           | Supply chain workers, contracted labour     | <ul style="list-style-type: none"> <li>Implement a Responsible Procurement Policy aligned with IFC PS and UNGPs.</li> <li>Include contractual clauses prohibiting forced labour, child labour, and unsafe working conditions.</li> <li>Conduct risk-based supplier screening and due diligence for high-risk categories.</li> <li>Require suppliers to maintain labour compliance certifications where applicable.</li> <li>Perform periodic supplier audits and performance monitoring.</li> <li>Develop corrective action plans for non-compliant suppliers.</li> </ul>                                   | <ul style="list-style-type: none"> <li>Supply chain labour compliance (contractors and suppliers)</li> </ul>                         | <p>SPV-Private Company</p> <p>FM Co.</p>                                                                                                                        |
| Access to Remedy and Grievance Mechanisms | Workers, patients, contractors, communities | <ul style="list-style-type: none"> <li>Establish multi-channel grievance mechanisms (in-person, digital, anonymous hotlines).</li> <li>Ensure access for workers, patients, contractors, and communities.</li> <li>Guarantee non-retaliation and confidentiality protections.</li> <li>Define clear timelines for grievance resolution and escalation pathways.</li> <li>Maintain grievance tracking system and periodic reporting dashboard.</li> <li>Provide culturally appropriate communication in local languages.</li> <li>Integrate grievance outcomes into continuous improvement system</li> </ul> | <ul style="list-style-type: none"> <li>Grievance mechanism performance (number, type, resolution time, satisfaction rate)</li> </ul> | <p>MoH (limited to clinical workers, clinical services and patient related grievances)</p> <p>SPV-Project Company (limited to community related grievances)</p> |

## 7 E&S Management Plans and Procedures

Once E&S aspects and associated risks have been identified and documented, associated controls will be developed that are commensurate to the level of anticipated severity, likelihood and any statutory or lender requirements.

### 7.1 E&S Management Plans

The key E&S management plans linked to the development of the Project are the CESMP and OESMP, to be developed for the construction and operational phase respectively.

The CESMP and OESMP will comprise of a stand-alone document structured to detail how environmental and social risks, impacts and compliance will be managed and monitored. This shall be the top-level management plan document prepared by the EPC Contractor and FM Co. respectively.

The typical content of a CESMP/OESMP is as outlined below. It is not mandatory that the management plans be structured in this manner, but it is expected that the headings and sub-headings as a minimum are captured within the respective CESMP/OESMPs.

- INTRODUCTION
  - Scope of the CESMP/OESMP
  - Objectives of the CESMP/OESMP
  - Structure of the CESMP/OESMP
  - Limitations
- PROJECT DESCRIPTION
  - Project Rationale and Background
  - Project Location
  - Land Use
  - Sensitive Receptors
  - Overview of Project Components
  - Overview of Associated Facilities
  - Overview of Construction/Operational Works and Workforce Requirements
  - Overview of Construction/Operational Facilities
  - Project Schedule (for the CESMP)
- REGULATORY FRAMEWORK
  - Background of Project Environmental Permitting (and status)
  - Overview of Regulatory Framework and Compliance Obligations
    - Regional and International Treaties and Conventions (Uzbekistan is a signatory of)
    - Uzbekistan Legislation
    - Lenders Requirements
    - Environmental Standards
- ENVIRONMENTAL AND SOCIAL MANAGEMENT

- Summary of Environmental and Social Management System (ESMS)
- Reference to E&S Policies
  - Project Company E&S Policy
  - Other Policies (if applicable)
- Statement of other supporting/complementary Plans and Procedures
- Organisational Structure
  - NCECC
  - Project Company
  - EPC Contractor (for CESMP) / FM Company (for OESMP)
  - Sub-contractors
- HSE Roles and Responsibilities
- Competency Needs for HSE staff
- Environmental Awareness and Training
  - E&S Induction Training
  - Toolbox Talk E&S Training Sessions
  - CESMP/OESMP and other specific E&S Training
- Internal and External Communications
  - Internal Communication
  - External Communication
  - Liaison with Regulator
- Inspections and Audits
  - Daily and Weekly Inspections
  - Internal Audits
  - Annual Internal Audits
  - External Audits
- Non-conformity, Incidents and Corrective Action
  - Non-Conformity, Investigation and Response
  - Incident Definition, Reporting, Investigation and Response
  - Corrections and Corrective Actions
- Control of Records
- MITIGATION, MANAGEMENT AND MONITORING
  - Air Quality
  - Climate Change
  - Noise & Vibration
  - Terrestrial Ecology
  - Water Resources

- Topography, Geology and Soil
- Solid Waste and Wastewater
- Landscape and Visual
- Traffic and Transportation
- Archaeology and Cultural Heritage
- Socio-economic
- Community Health and Safety
- Labour and Working Conditions
- Human Rights
- Monitoring
- Appendices

## 7.2 Supporting ESMS Management Plans

In alignment with the expected Project impacts (based on ESIA Volume 2), the following table provides a list of plans that have been identified to be part of the construction and/or operational phase ESMS documents.

All management plans, including those prepared by the EPC Contractor and FM Company will be subject to the review and approval of the SPV. Lenders and their advisors may also wish to approve such plans, which may be stated as ESAP requirements.

### 7.2.1 SPV (Construction & Operations)

**Table 7-1 Supporting ESMS Management Plans**

| Management Plan                                                       | Responsibility             | Purpose and Key Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-----------------------------------------------------------------------|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Stakeholder Engagement Plan (SEP) and Grievance Mechanism (GM)</b> | <b>SPV-Project Company</b> | <ul style="list-style-type: none"> <li>Establishes the framework for engagement with all project-affected parties, including communities, regulators, local authorities, and vulnerable groups, across construction and operational phases.</li> <li>Must include: stakeholder identification and mapping, methods and frequency of engagement, disclosure of project information, culturally appropriate consultation processes and accessible to all affected parties without cost or retribution.</li> <li>GM must provide a documented, time-bound process for receiving, tracking, investigating, and resolving complaints, with escalation pathways to lenders if grievances are not resolved.</li> <li>Specific engagement requirements for vulnerable groups, women, and labour migrants must be incorporated.</li> <li><u>The Internal &amp; External GM will serve to:</u> Identify the procedure for external parties and all site staff to be able to raise issues, concerns and opportunities for improvement for any aspect of their employment on the project including issues relating to GBVH and sexual exploitation.</li> </ul> |

| Management Plan                                   | Responsibility             | Purpose and Key Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|---------------------------------------------------|----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                   |                            | <ul style="list-style-type: none"> <li>The mechanism shall be easily accessible (including for any vulnerable groups), non-discriminatory and provide a transparent process to raise concerns or complaints, which may be issued in an anonymous nature. The mechanism shall specify the roles and responsibilities of internal staff with regard to the grievance mechanism and the procedure for responding to received grievances, including the timeline for response, engagement mechanisms and record keeping.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Labour Management Procedure (LMP)</b>          | <b>SPV-Project Company</b> | <ul style="list-style-type: none"> <li>Overarching framework governing all labour and working conditions across the SPV, EPC Contractor, FM Co., and supply chain, in accordance with IFC PS2 and EBRD PR2.</li> <li>Must address: terms and conditions of employment, non-discrimination and equal opportunity, worker organisations and collective bargaining, child labour prohibition, forced labour prohibition, OHS, worker grievance mechanism, and retrenchment.</li> <li>Must cover all workforce tiers: construction workforce, FM Co. workforce, clinical staff, and third-party contractors.</li> <li>Must address the risk of child and forced labour in the construction supply chain given the Uzbekistan context.</li> </ul>                                                                                                                                                                                                                        |
| <b>Supply Chain Management Procedure</b>          | <b>SPV-Project Company</b> | <ul style="list-style-type: none"> <li>Establishes the framework for identifying and managing E&amp;S risks in the project supply chain, including contractors, subcontractors, and material suppliers.</li> <li>Key risk areas: labour standards and child/forced labour in construction supply chain; compliance of licensed waste contractors and disposal facilities; compliance of licensed medical waste transport operators.</li> <li>Must include: supplier/contractor E&amp;S screening criteria, due diligence procedures, contractual E&amp;S obligations, monitoring and audit, and corrective action procedures.</li> <li>Develop and implement a responsible sourcing policy with minimal key E&amp;S international and lender requirements for third parties to be cascaded to the EPC Contractor and FM Co. respectively. A Due Diligence should be in-place to ensure that contracted suppliers meet the legal and policy requirements.</li> </ul> |
| <b>Community Health, Safety and Security Plan</b> | <b>SPV-Project Company</b> | <ul style="list-style-type: none"> <li>Addresses potential construction and operational phase impacts on the health, safety, and security of surrounding communities.</li> <li>Key requirements: management of construction impacts and management of hazardous healthcare waste and wastewater.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

| Management Plan                              | Responsibility             | Purpose and Key Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------------------------------------------|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                              |                            | <ul style="list-style-type: none"> <li>Must include a specific protocol for communicating healthcare waste spill incidents to affected communities.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Occupational Health &amp; Safety Plan</b> | <b>SPV-Project Company</b> | <p>Identify the required controls for worker health and safety during the construction, commissioning and operational phases. As a minimum, this plan will include:</p> <ul style="list-style-type: none"> <li>Means of identifying and minimising, so far as reasonably practicable, the causes of potential hazards to workers.</li> <li>Provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances.</li> <li>Provision of appropriate equipment to minimise risks and requiring and enforcing its use.</li> <li>Training of workers, and provision of appropriate incentives for them to use and comply with health and safety procedures and protective equipment.</li> <li>Documentation and reporting of occupational accidents, diseases and incidents.</li> <li>Emergency prevention, preparedness and response arrangements.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Supply Chain Risk Management Plan</b>     | <b>SPV-Project Company</b> | <ul style="list-style-type: none"> <li>Ensure compliance with lender E&amp;S performance standards and national laws across the primary supply chain.</li> <li>Prevent and mitigate adverse E&amp;S impacts (e.g., forced labour in material sourcing, habitat degradation from quarrying or timber supply).</li> <li>Enhance supply chain transparency and traceability, enabling early risk detection and corrective action.</li> <li>Support responsible sourcing by embedding E&amp;S criteria into procurement and contractor management processes.</li> <li>Provide a monitoring and grievance mechanism for supply chain related E&amp;S issues, integrated with the project's overall ESMS reporting.</li> </ul> <p>Develop and implement a responsible sourcing Policy with minimal E&amp;S requirements to be cascaded to the EPC Contractor and FM Co. for third parties. A Due Diligence should be in-place to ensure that suppliers meet the legal and policy requirements.</p> <ul style="list-style-type: none"> <li>Supplier Code of Conduct: mandate compliance with E&amp;S standards (no child/forced labour, OSH, no habitat conversion, grievance access).</li> <li>Contractual clauses: include E&amp;S obligations, audit rights, remediation requirements, and termination for non-compliance in procurement contracts.</li> <li>Certification preferences: require independently certified products</li> </ul> |

| Management Plan | Responsibility | Purpose and Key Requirements |
|-----------------|----------------|------------------------------|
|                 |                |                              |

## 7.2.2 EPC Contractor (Construction)

| Management Plan                                                      | Responsibility        | Purpose and Key Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|----------------------------------------------------------------------|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Construction Environmental and Social Management Plan (CESMP)</b> | <b>EPC Contractor</b> | <ul style="list-style-type: none"> <li>Overarching E&amp;S document for the construction phase. The CESMP is the primary construction-phase management instrument and incorporates all subsidiary environmental and social plans as components, including but not limited to: dust and air quality management, noise and vibration management, soil and groundwater protection, surface water and drainage management, hazardous materials management, spill prevention and response, chance finds procedure, and construction worker accommodation and welfare.</li> <li>Must be submitted to the SPV and lenders for review and approval prior to commencement of works.</li> <li>Must demonstrate compliance with applicable Uzbek environmental regulations, IFC PS, EBRD PR, and all project-specific ESAP commitments.</li> <li>To be updated to reflect any changes in construction methodology, scope, or phasing.</li> </ul> |
| <b>Construction Waste Management Plan (CWMP)</b>                     | <b>EPC Contractor</b> | <ul style="list-style-type: none"> <li>Given the specific waste management risks associated with this Project, the CWMP is identified as a standalone plan requiring separate preparation and approval, consistent with the mitigation measures committed in the ESIA.</li> <li>Must confirm prior to construction: identity and compliance status of the receiving landfill for waste; and licensed contractors for hazardous construction waste.</li> <li>Must include a waste register tracking type, volume, contractor, and disposal destination for all waste streams throughout construction.</li> </ul>                                                                                                                                                                                                                                                                                                                       |
| <b>Construction Traffic Management Plan (CTMP)</b>                   | <b>EPC Contractor</b> | <ul style="list-style-type: none"> <li>Given the cumulative traffic risk associated with concurrent construction across the 300-hectare Eco City site, the CTMP is identified as a standalone plan requiring separate preparation and approval.</li> <li>Must address: designated vehicle routes, delivery scheduling to avoid peak traffic periods, HGV routes, and measures to protect pedestrians at site entrances.</li> <li>Must be prepared in conjunction with the Eco City master developer and must be informed by the Traffic Impact Assessment for the Eco City.</li> </ul>                                                                                                                                                                                                                                                                                                                                                |
| <b>Construction Occupational Health</b>                              | <b>EPC Contractor</b> | <ul style="list-style-type: none"> <li>Identify the required controls for worker health and safety during the construction, commissioning and</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

| Management Plan                            | Responsibility | Purpose and Key Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>and Safety Management Plan (COHSMP)</b> |                | <p>operational phases. As a minimum, this plan will include:</p> <ul style="list-style-type: none"> <li>○ Hazard identification and risk assessment, safe work procedures for high-risk activities (working at height, lifting operations, excavation, electrical work, confined space entry), PPE requirements, induction and ongoing training programme, incident reporting and investigation, and medical surveillance.</li> <li>○ Means of identifying and minimising, so far as reasonably practicable, the causes of potential hazards to workers.</li> <li>○ Provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances.</li> <li>○ Provision of appropriate equipment to minimise risks and requiring and enforcing its use.</li> <li>○ Training of workers, and provision of appropriate incentives for them to use and comply with health and safety procedures and protective equipment.</li> <li>○ Documentation and reporting of occupational accidents, diseases and incidents.</li> <li>○ Emergency prevention, preparedness and response arrangements.</li> </ul> |

### 7.2.3 FM Company (Operation)

| Management Plan                                                     | Responsibility | Purpose and Key Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------------------------------------------------------------------|----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Operational Environmental and Social Management Plan (OESMP)</b> | <b>FM Co.</b>  | <ul style="list-style-type: none"> <li>• Overarching environmental and social management document for the operational phase. The OESMP is the primary operational management instrument and incorporates all subsidiary environmental management plans as components, including but not limited to: air quality monitoring, noise management, soil and groundwater protection, stormwater management, pest and vector control, energy and water efficiency, and general environmental housekeeping.</li> <li>• Must be submitted to the SPV and lenders for review and approval prior to hospital commissioning.</li> <li>• Must demonstrate compliance with applicable Uzbek environmental regulations, IFC PS, EBRD PR, and all project-specific ESAP operational phase commitments.</li> <li>• Must incorporate the environmental monitoring programme covering all operational phase monitoring commitments from the ESIA.</li> </ul> |

| Management Plan                                               | Responsibility | Purpose and Key Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---------------------------------------------------------------|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Healthcare Waste Management Plan (HWMP)</b>                | <b>FM Co.</b>  | <ul style="list-style-type: none"> <li>Primary operational waste management document covering all five waste classes under SanPiN No. 0317-15: Class A (non-hazardous), Class B (epidemiologically hazardous), Class C (extremely epidemiologically dangerous), and Class D (toxic/chemical).</li> <li>FM Co. is accountable for non-clinical waste management and the logistics, storage, and contractor interface for all waste streams.</li> <li>The HWMP must specify the handover arrangements and chain-of-custody documentation.</li> <li>Must confirm prior to operations: licensed disposal contractor for Classes B-D; confirmed receiving facility; waste transfer manifest system; on-site interim storage specifications.</li> <li>A licensed and operational disposal route must be confirmed and contracted before hospital commissioning.</li> <li>Must incorporate the FM Co.'s waste tracking system and colour-coded segregation system.</li> </ul> |
| <b>Wastewater Management Plan (WWMP)</b>                      | <b>FM Co.</b>  | <ul style="list-style-type: none"> <li>Governs all hospital wastewater streams during operations: domestic wastewater, medical/laboratory wastewater, kitchen and laundry wastewater, and specialist streams including radiopharmaceutical wastewater, autoclave condensate, and cytotoxic wastewater.</li> <li>Must address the on-site pre-treatment system: design specifications, treatment standards, operational and maintenance procedures, and performance monitoring.</li> <li>Must confirm government approvals prior to connection to the municipal sewerage network.</li> <li>Effluent quality monitoring at the point of discharge.</li> </ul>                                                                                                                                                                                                                                                                                                            |
| <b>Operational Traffic Management Plan (OTMP)</b>             | <b>FM Co.</b>  | <ul style="list-style-type: none"> <li>Governs patient, visitor, staff, emergency vehicle, supply chain, and waste contractor traffic during 24-hour hospital operations.</li> <li>Must address: designated access routes per traffic category; emergency vehicle access physically separated from general traffic at all times; parking provision; waste contractor scheduling to avoid peak traffic periods; and interface with the Eco City internal road network.</li> <li>Must be informed by the completed Traffic Impact Assessment for the Eco City and coordinated with the Eco City master developer.</li> </ul>                                                                                                                                                                                                                                                                                                                                             |
| <b>Occupational Health and Safety Management Plan (OHSMP)</b> | <b>FM Co.</b>  | <ul style="list-style-type: none"> <li>Governs OHS for the FM Co. workforce providing 24/7 facilities management services at the hospital and establishes the facility wide OHS framework.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| Management Plan                                | Responsibility | Purpose and Key Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|------------------------------------------------|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                |                | <ul style="list-style-type: none"> <li>Key hazards specific to this project: exposure to clinical and hazardous healthcare waste (Classes B-D) during handling, storage, and transport; confined space entry in plant rooms and drainage infrastructure; HVAC and electrical maintenance.</li> <li>Must include: risk assessments for all high-hazard FM Co. activities; PPE requirements; vaccination programme (hepatitis B and tetanus minimum for waste handling staff); needle-stick and sharps injury protocol including post-exposure prophylaxis; and incident reporting and investigation.</li> </ul> |
| <b>Fire Safety and Emergency Response Plan</b> | <b>FM Co.</b>  | <ul style="list-style-type: none"> <li>Governs fire prevention, detection, suppression, and evacuation procedures for the hospital facility during operations.</li> <li>Must address: fire detection and alarm system, sprinkler and suppression systems, evacuation routes for patients with limited mobility, coordination with Fergana city fire service, and specific protocols for fire in areas storing hazardous healthcare waste materials.</li> <li>Must be integrated with the SPV-level EPRP</li> </ul>                                                                                             |

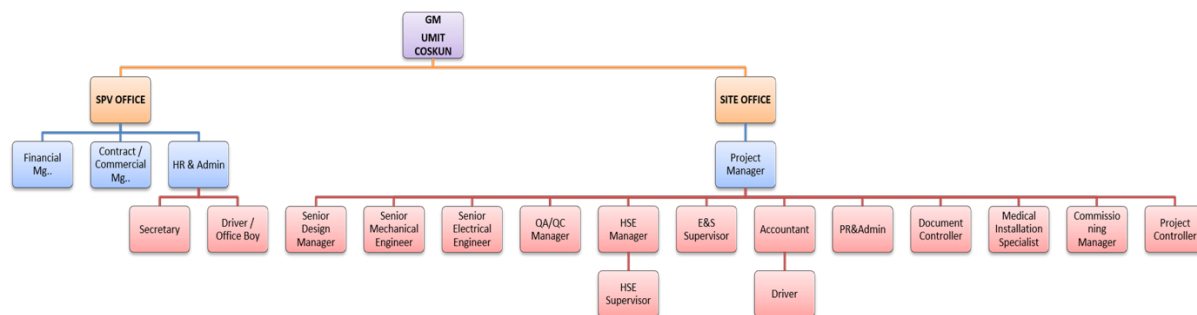
## 8 Organisational Capacity

### 8.1 Roles and Responsibilities

The implementation of the ESMS requires competent personnel and sufficient allocation of resources. Roles and responsibilities per project party (excluding MoH) are outlined below.

#### 8.1.1 SPV-Project Company

The SPV-Project Company will be structured as follows:



##### 8.1.1.1 E&S Supervisor

Responsibilities include:

- Technical oversight and support for the implementation of the project ESMS through the Project's E&S policy, ESIA requirements, ESAP, SEP, as well as the coordination of E&S resources, throughout the Project's lifetime.
- Coordination with the SPV-Project Company's top management for the establishment of an E&S team within the SPV-Project Company who will be directly involved in the implementation of the ESMS.
- Coordination with the SPV-Project Company's top management for the engagement of Lenders' E&S Advisor, for undertaking regular, independent monitoring of this plan including the completion audit.
- Institution of the Project-level E&S Policy, which will include a commitment towards the management of E&S impacts in line with legal requirements and compliance obligations.
- Review and approval of ESMS documents prepared by the contracted project parties that are responsible for relevant construction and operational E&S management.
- Coordination with the SPV-Project Company's Human Resource (HR) Department and the EPC Contractor's HSE Manager to ensure the delivery of transitional support for through project employment.
- Participation in site visits and stakeholder engagements integrating into internal and external E&S monitoring related to this plan.
- Review of regular internal E&S monitoring reports, which will include information relating to E&S impacts and the progress of relevant mitigation.

- Maintaining an inventory of draft and final ESAP documents, internal E&S monitoring reports and grievance registers.
- Undertake site visits and stakeholder engagements (under the SEP) integrating into internal and external E&S monitoring of this plan in coordination with the Public Relations (PR) & Admin.
- Inputs for responses to grievances received in coordination with the PR & Admin.

#### **8.1.1.2 PR & Admin**

Responsibilities include:

- Coordinating the implementation of the SEP and associated stakeholder engagement activities.
- Acting as the primary point of contact for external communications with community stakeholders and other interested parties, in coordination with the E&S Supervisor.
- Coordinating the disclosure of Project information in accordance with the SEP and Project requirements.
- Receiving, registering, tracking and coordinating the resolution of complaints and grievances through the Project's GRM.
- Maintaining stakeholder engagement and grievance registers, ensuring that all engagements, grievances, actions and outcomes are appropriately documented.
- Coordinating with the E&S Supervisor and relevant Project personnel to ensure timely investigation, response and close-out of grievances.
- Escalating significant stakeholder issues and reputational risks to the E&S Supervisor and Project Management, as appropriate.

#### **8.1.1.3 HSE Manager**

Responsibilities include:

- Providing overall oversight of OHS management and performance.
- Ensuring the implementation of the Project's OHS Policy and applicable H&S requirements under the ESMS.
- As applicable Reviewing and approving H&S management plans and procedures prepared by the EPC Contractor and FM Co.
- Monitoring compliance with applicable legal requirements, Project standards and lender requirements relating to H&S.
- Reviewing H&S performance, incidents, audits and inspections, and ensuring appropriate corrective and preventive actions are implemented.
- Coordinating with the EPC Contractor, FM Co. and E&S Supervisor on significant H&S risks, incidents and emergency preparedness.
- Reporting significant H&S performance and issues to SPV-Project Company Management.

#### **8.1.1.4 HSE Supervisor**

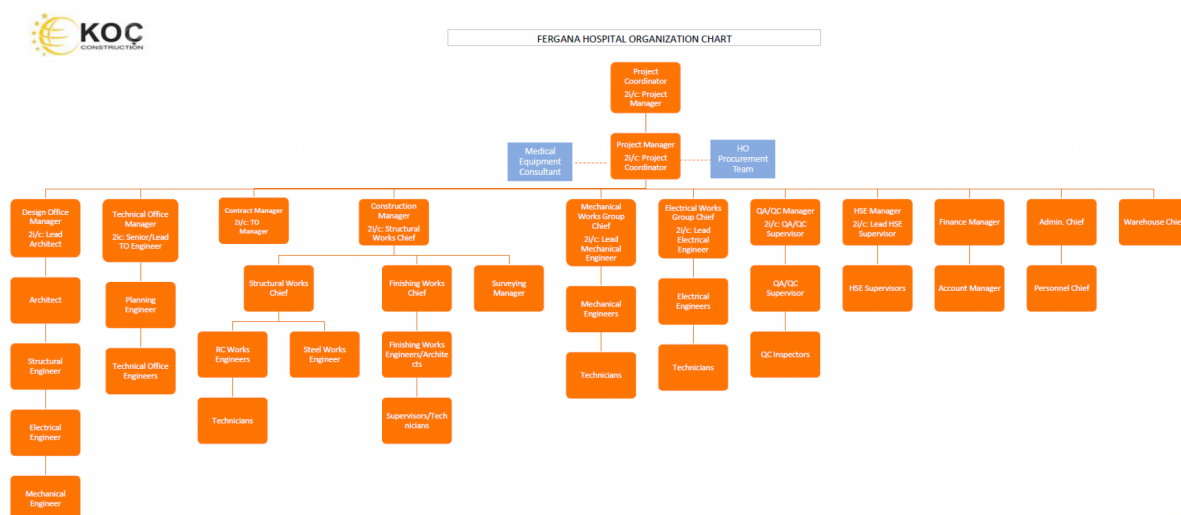
Responsibilities include:

- Supporting the HSE Manager in monitoring day-to-day H&S management and performance across the Project.

- Undertaking routine site inspections and compliance monitoring to verify implementation of Project H&S requirements.
- Participating in H&S audits, inspections and incident investigations.
- Monitoring the implementation and close-out of corrective and preventive actions arising from inspections, audits and incidents.
- Reviewing H&S records, permits, training and inspection reports submitted by the EPC Contractor and FM Co.
- Supporting emergency preparedness activities, drills and H&S awareness initiatives.
- Reporting H&S observations, non-conformances and emerging risks to the HSE Manager.

### 8.1.2 EPC Contractor

The EPC Contractor will be structured as follows:



During the construction phase, the SPV-Project Company will contractually delegate responsibility for the implementation of most E&S management and compliance requirements to the EPC Contractor.

The EPC Contractor will be required to assign clearly defined E&S roles and responsibilities to suitably qualified Project personnel and subcontractors to support the effective implementation of the ESMS, as outlined below.

### 8.1.3 Management Team

In order to effectively implement the Project ESMS, management of both the EPC Contractor will need to:

- Fully support the implementation of the Project's E&S Policy (under the SPV-Project Company) and the internally developed ESMS.
- Ensure that the E&S Policy is included/referenced as part of sub-contractor agreements.
- Promote a positive E&S culture and good practices by personal example and leadership.
- Review and approve E&S management budgets, resourcing and staffing.

- Ensure resources (human and financial) are allocated appropriately to manage the ESMS.
- Conduct regular (weekly) management site inspections (including joint inspections with the SPC-Project Company and other project parties) that include a specific focus and collaboration on E&S issues.
- Promote discussion of E&S issues at internal meetings; and
- Monitor and report on E&S management and performance to the SPV-Project Company.

#### 8.1.3.1.1 Responsibilities for E&S Management

The EPC Contractor will need to ensure that responsibility for the implementation of the Project's ESMS lies with a full-time member(s) of staff based at the Project site.

The EPC Contractor E&S Roles & Responsibilities (LNTP and Construction Phase) are detailed below.

**Table 8-1 EPC Contractor Staff Roles and Responsibilities**

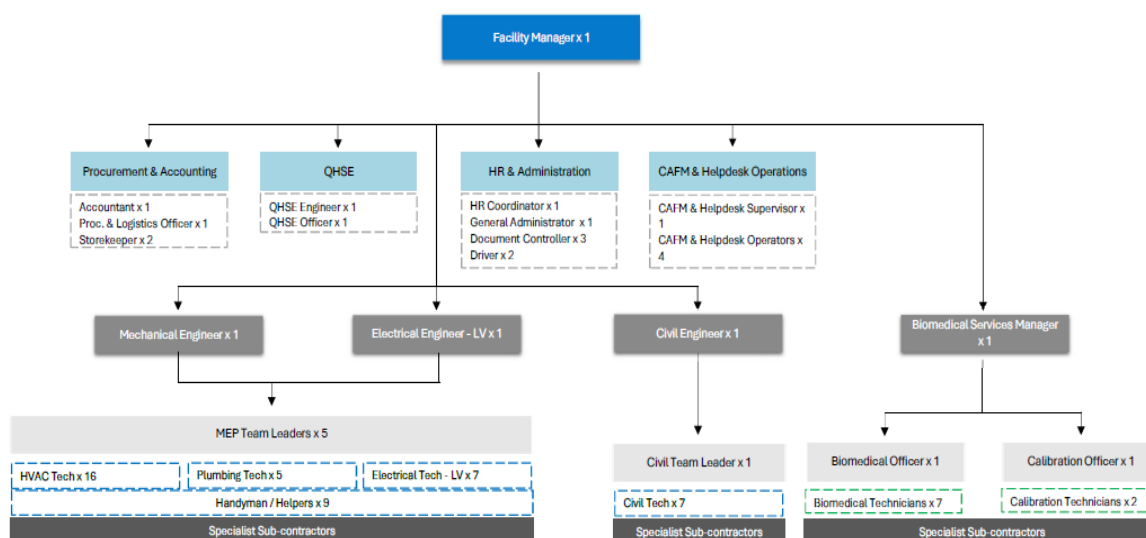
| Role               | Responsibilities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>HSE Manager</b> | <p><b>For E&amp;S</b></p> <ul style="list-style-type: none"> <li>• In coordination with the SPV-Project Company, obtain all environmental and social (E&amp;S) permits, licences and approvals that fall within the EPC Contractor's scope of work prior to the commencement of construction activities, and ensure they are maintained, renewed and updated, as applicable, throughout the construction phase;</li> <li>• Ensure the availability of required resources for the effective implementation of scope elements of the ESMS that fall under the EPC Contractor's responsibility;</li> <li>• Ensure that ESMS documents that fall under the EPC Contractor's responsibility are established, periodically reviewed and updated, and that these remains in place and implemented throughout the construction phase;</li> <li>• Review and analyse E&amp;S performance during construction and prepare relevant reports for submission to the SPV-Project Company;</li> <li>• Ensure personnel are competent, trained and have the necessary skills to conduct their functions. Where skills appears deficient, to identify the further training and/or capacity building required;</li> <li>• Be part of regular coordination and management meetings to ensure that all construction activities are planned, coordinated and conducted safely to minimise E&amp;S impacts;</li> <li>• Work with other relevant EPC Contractor and SPV-Project Company teams to identify training needs and develop training programmes accordingly;</li> <li>• Stop any unsafe activity which is not compliant with national legislation or Project's E&amp;S requirements.</li> <li>• Approve E&amp;S incident investigations and corrective actions taken in response to incidents and non-conformances at the Project.</li> </ul> <p><b>For OHS</b></p> <ul style="list-style-type: none"> <li>• The HSE Manager shall be responsible for coordinating and implementing the OHS Policy and related management plans.</li> <li>• Understand all project OHS requirements and ensure they are fully enforced on the project;</li> <li>• Determine the most appropriate and safest method of performing activities and delegation of responsibilities for the EPC Contractor's personnel and Sub-</li> </ul> |

| Role | Responsibilities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|      | <p>contractors by considering best industry practices on environmental and social safeguard;</p> <ul style="list-style-type: none"> <li>• Ensure that all foremen and supervisors are aware of the project specific ESIA and CESMP and OHS work requirements before commencing their work;</li> <li>• Review and approve Job Safety Analysis, Method Statements and Permits to Work linked to various construction activities, for EPC Contractor and any Sub-contractor activities.</li> <li>• Keep Records of all incidents and environmental damage that has occurred at the site;</li> <li>• Keep a record of all weekly environmental safety meetings, toolbox talks and the like on site, complete with subject discussed and a signed list of attendees;</li> <li>• Determine cause of any environmental incident occurrence through incident investigation and recommend measures to prevent recurrences;</li> <li>• Conducts environmental training, toolbox talks and inductions in line with the ESIA and CESMP;</li> <li>• To stop work immediately in case of non-compliance observed and/or there are significant environmental effects including social worker welfare risks and associated incidents;</li> <li>• Maintain an environmental incident register, documenting all incidents of compliance/non-compliance with the and keep the Project Manager appropriately informed;</li> <li>• Maintain environmental document control, reporting, inductions and training; and</li> <li>• Participates in weekly and monthly environmental meetings, as required.</li> </ul> |

#### 8.1.4 Facility Management Company

The Project Company will contractually delegate responsibility for day-to-day elements of E&S management and compliance to the FM Co. for the Project operation phase.

The FM Co. will allocate dedicated roles and responsibilities for ESMS implementation to Project staff, and subcontractors. E&S management elements relating to the FM Co. will be managed through the FM Co.'s QHSE team (as below).



### 8.1.4.1 Management Team

In order to effectively implement the Project ESMS, management of the FM Co. will need to:

- Fully support the implementation of the Project's E&S Policy (under the SPV-Project Company) and the internally developed ESMS.
- Ensure that the E&S Policy is included/referenced as part of sub-contractor agreements.
- Promote a positive E&S culture and good practices by personal example and leadership.
- Review and approve E&S management budgets, resourcing and staffing.
- Ensure resources (human and financial) are allocated appropriately to manage the ESMS.
- Conduct regular (weekly) management site inspections (including joint inspections with the SPC-Project Company and other project parties) that include a specific focus and collaboration on E&S issues.
- Promote discussion of E&S issues at internal meetings; and
- Monitor and report on E&S management and performance to the SPV-Project Company.

#### 8.1.4.1.1 QHSE Engineer & QHSE Officer

- Fully support the implementation of the E&S Policy;
- Engage with the project management regularly in regard to E&S issues, risks and compliance management;
- Oversee and ensure execution of the environmental and social management programmes by other project parties (such as sub-contractors and key suppliers);
- Monitor the Project to ensure environmental and social compliance (including for sub-contractors - as per the scope of the ESMS);
- Advise management on matters pertaining to the environmental and/or social elements;
- Investigate environmental and social issues, incidents and non-conformances, implement corrective actions and report those to the management/relevant authorities;
- Maintain applicable environmental and social records as required by the ESMS (e.g. incident registers, NCR reports, corrective action reports, grievance register etc.);
- Ensure monitoring programmes are implemented by qualified personnel and report the results to the Project management for review and as a basis for continuous improvement;
- Display and monitor site bulletin boards to ensure they remain 'live' and 'up-to-date' with relevant E&S information;
- Coordinate, plan, formulate and/or deliver environmental and social induction training to all project personnel (including subcontractors) as well as regular toolbox talk environmental training sessions;
- Organise programmes and activities to promote environmentally responsible conduct in the prevention of injury, ill health and environmental impact throughout the workforce;

- Stop any unsafe activity which is not compliant with environmental legislation or lender requirements, and correct such work practice and/or conditions before allowing work to resume/commence;
- Act as point of contact for any sub-contractor with regard to environmental issues;
- Ensure that each sub-contractor is aware, compliant and implementing the requirements of the ESMPs;
- Review subcontractor's personnel, qualifications, competency and environmental performance; and
- Undertake regular internal ESMS audits to assess compliance and implement corrective & preventative actions – audits are to include all sub-contractors at the project.

### 8.1.5 Sub-Contractors

Sub-contractors of the EPC Contractor and FM Co., will be required to:

- Implement the Project's E&S requirements included in their sub-contractors agreement;
- All sub-contractors are required to work in accordance with the E&S Policy and ESMS;
- All sub-contractors workers are required to attend Project and/or site inductions prior to commencing work on-site. A record of all subcontractors inducted will be maintained as part of the Project induction and training register;
- Sub-contractors, as a minimum, shall ensure that before commencing work that they are fully aware of the provisions applicable to their scope of work and in reference to the following:
  - Project specific Policies, ESMP & OHS Plans and Program;
  - Understand and comply with all relevant environmental requirements applicable to their scope of work and specific requirements linked to activities (that may require permits to work, or other detailed method statements and job-safety analysis to be prepared and approved); and
  - Ensure that sub-contractors personnel have the necessary skills, training and qualifications and experience to properly execute their contract scope of work.

## 8.2 Environmental & Social Awareness and Training

E&S implementation will not be effective unless the project workforce are aware of their specific responsibilities with regard to E&S management. It is therefore necessary for the EPC Contractor and FM Co. to ensure that their workforce (including sub-contractors) are trained appropriately according to the relevant elements of the project ESMS applicable to their activities on the project. Hence personnel associated with waste management should require training on relevant components of the waste management plan.

### 8.2.1 Type of Training Sessions

The EPC Contractor/FM Co. (and as applicable, the sub-contractors) will deliver applicable elements of E&S training within:

- Induction Training

- To the entire workforce, to include key environmental and social components linked to the E&S Policy and developed ESMS; that are applicable to all employees.
- Tool-Box Talks
  - E&S tool-box talk training sessions on regular basis to remind workers of key and topical E&S considerations when undertaking typical construction activities; and
- Specific training sessions on ESMS and E&S Management Plans
  - To ensure staff are competent to implement the ESMS or undertake activities that may have inherent E&S risks or potential impacts to receptors. All staff with specific responsibilities and with authority to implement mitigation measures and monitoring/audit commitments should be trained in regard to such plans/procedures.

## 8.2.2 Planning of Training

In order to record identified training needs, the EPC Contractor/FM Co. will develop and maintain a project environmental training matrix (falling under wider HSE training) to identify the training type and frequency required for each staff role.

A training plan/programme will also be prepared to set out the frequency of training requirements.

All training material will be prepared in advance and documented. It will be prepared in English language and applicable local languages or those languages that apply to the engaged workforce. Where necessary translators may be required for specific sessions.

## 8.2.3 Content of Training Sessions

### 8.2.3.1 Induction Training

During project inductions, all project workforce and visitors will receive an element of E&S induction classroom training, which as a minimum will include an overview of:

- Project Policies;
- Contact details for key E&S and OHS project staff;
- Main topics of E&S and H&S risk/impact;
- Emergency response and internal reporting requirements including who shall be contacted in the instance of an incident;
- Duty of care, highlighting that all staff have a responsibility to carry out their duties in accordance with the E&S Policy and related ESMS and to report any and all environmental incidents; and
- Grievance Redress Mechanism, outlining grievance reporting mechanisms and pathways available to all workers with promise and emphasis on no-retaliation.

The induction shall make it clear that interference with any wildlife or archaeological remains, if encountered, shall be strictly prohibited. The training session will also highlight the importance of maintaining E&S awareness; the seriousness of E&S requirements and that compliance is a condition of employment.

No person shall commence relevant work until the required induction has been completed and recorded.

### 8.2.3.2 Toolbox Talk Environmental & Social Training Sessions

This will be varied depending on the risks, impacts, opportunities, compliance and topical considerations related to specific activities by construction/operational teams, but may include the following (provided as examples):

- Air quality emissions and control measures for vehicles, plant and equipment drivers/operators;
- Dust control and dust mitigation techniques for heavy vehicles' drivers and dust generating equipment operators;
- Erosion and sediment control for operators of earth moving equipment;
- Hazardous materials handling including handling, transportation and storage of hazardous materials as well as maintenance and refuelling of vehicles and machinery;
- Spill prevention and response for personnel involved in the storage of fuel and other hazardous materials;
- Noise control and mitigation measures for vehicles, plant and equipment drivers/operators;
- Traffic control and mitigation techniques for vehicle drivers (e.g. cars, buses, heavy goods vehicles, etc.);
- Waste management and chemicals and hazardous materials management, including transportation and disposal for all construction personnel;
- Emergency management and incident response for all construction personnel;
- Prohibition of child labour, forced labour, discrimination, harassment, and retaliation;
- Grievance procedure including methods to submit a complaint, review and response period;
- Gender Based Violence & Harassment (GBVH) including Sexual Exploitation & Abuse (SEA) reporting system and company/legal sanctions for such behaviour;
- Heat stress; etc.

### 8.2.3.3 Specific training sessions on ESMS and E&S Management Plans

Training sessions on the ESMS or specific activities or plans/procedures will need to be tailored and delivered to staff based on their specific content and key considerations.

The EPC Contractor and FM Co. will establish and maintain the training and competency programme under the ESMS. Training requirements will be proportionate to the individual's role, level of responsibility, work activities, and exposure to E&S risks.

The MoH shall remain responsible for training and competency arrangements relating to its clinical staff and clinical operations under its existing national and institutional policies. The Project Company may provide the MoH with information on relevant lender expectations and invite MoH representatives to participate in interface-related training. Such engagement shall be undertaken on a best-efforts and coordination basis and shall not create a binding obligation on the MoH to adopt the Project Company's training system.

### 8.2.3.4 Training Records

The project parties shall maintain documented records of training and competency activities. Further to the training being undertaken the environmental training records will identify as a minimum:

- Description and purpose of training;
- Date and location;
- Trainer and attendees (with attendance signatures);
- Employer, contractor, or subcontractor represented;
- Training materials and language used;
- Assessment results or competency verification;
- Expiry dates for licences and certifications;
- Refresher training requirements;
- Corrective actions arising from failed assessments or identified gaps; and
- Photos or other documents as attachments to evidence the training.

A consolidated record of training undertaken by all workers will be maintained and will be comparable against the training matrix.

The EPC Contractor and FM Co. shall submit updated training records and competency statistics at the frequency defined in their contracts. Training records relating to MoH personnel shall remain under MoH control, except for information voluntarily shared or required for managing a material Project interface risk.

## 9 Inspection and Audit

Monitoring of E&S risks and compliance will be undertaken via site-based inspections and Project specific audits (vs. compliance obligations). Such processes are integral requirement of any management system and should be considered as a continual process to ensure the successful implementation of the ESMS.

Where deficiencies are identified, the responsible party shall prepare and implement a corrective training action within an agreed timeframe.

### 9.1 Inspections

Various parties and project roles have responsibilities relating to inspection. Inspections will occur on an on-going basis through the project's lifetime. This will include the following:

- On-going observations made in Project areas that relate to E&S/OHS risks, impacts and compliance.
  - Such observations can be made by any Project worker but are expected to be made mostly by the dedicated E&S/OHS roles who have specific responsibilities and expertise to identify and manage such items. This includes HSE Officers present in working areas.
- Formal inspections made via:
  - Management walkdowns;
  - E&S/OHS team walkdowns;
  - Periodic inspections of certain areas of the site and temporary facilities (e.g. temporary construction facilities and workers' accommodation).

### 9.2 Internal Audits

The SPV-Project Company, EPC Contractor and FM Co. shall establish and maintain an internal E&S audit programme per party as part of the Project's ESMS.

The purpose of the programme is to verify whether the ESMS, ESMPs, applicable legal and permit requirements, lender requirements, and contractual E&S obligations are being implemented effectively. The ESMS will establish, implement and maintain an internal audit programme that identifies the frequency, methods, responsibilities, planning requirements and reporting of audits.

The scope of the audits will be defined as per the scope of the ESMS (outlined above).

The internal audits will be undertaken by the respective parties on a quarterly basis during the construction/commissioning phase and annually during the operational phase.

When undertaking internal audits, the following will need to be established:

- Defined the scope, audit criteria and the objectives of each audit;
- Selection of staff competent in the audit process and subject matter; and
- Ensuring that audit results are reported to relevant senior management and tracked for corrective actions.

Internal audits shall be risk-based, documented, and undertaken at planned intervals. They shall assess both compliance and effectiveness, including whether controls are implemented in practice and whether identified risks are being adequately managed.

The internal audit programme shall operate as part of a continuous improvement cycle comprising planning, implementation, monitoring, audit, management review, corrective action, and follow-up. All internal audits will be documented as formal reports. Where observations and non-conformances are identified these will be recorded and corrective actions undertaken.

The SPV-Project Company's audit programme shall not replace the EPC Contractor's or FM Company's own inspections, audits, and management reviews. Each contractor shall remain responsible for verifying its own performance and that of its subcontractors.

**Note:** *The scope of the ESMS excludes clinical operations by the MoH during operations. Hence, the internal ESMS audits during operations will be limited to the activities and operations of the FM Company. Where the internal audits observe potential concerns relating to operational activities under the scope of MoH these will be noted separately and advised to the MoH as recommendations for their corrective actions.*

### 9.3 Lenders Monitoring and Reporting

The requirements for such monitoring and reporting will be agreed with the lenders in the Project ESAP.

These reports are expected to be based upon site visits by the lenders' advisor to evaluate the implementation of both the ESAP (a covenant to the loan), compliance with applicable E&S standards and the suitability & effective of the established ESMS in practice.

## 10 Observations, Non-Conformity and Corrective Action

### 10.1 Observations

The majority of findings made during day-to-day observations and inspections are expected to be corrected quickly and easily by the respective responsible parties. Documentation will not specifically be recorded in regard to such observations, although there may well be a record of communication in this regard.

Where observations are more significant or cannot be corrected immediately, these will need to be added to a formal tracking system, that will enable tracking of finding status and corrective action. It is necessary to include such findings on formal checking systems to ensure that effective corrective actions are taken.

### 10.2 Non-Conformances

Non-conformances are instances where Project compliance obligations (such as a legal requirement, or ESMS requirement) are not being fulfilled or cannot be evidenced. Non-conformances will be issued in relation to:

- A breach of an E&S contractual obligations;
- A failure to comply with a Project E&S policy, or related E&S requirement/obligation (including E&S management plans);

Examples of non-conformity include, but are not limited to:

- Commencement of works without ensuring pre-clearance processes are undertaken in relation to ecological surveys (and any required species translocations);
- Commencement of works without a permit, an approved risk assessment and method statement that covers environmental issues identified herein;
- No review of risk assessment and method statements following any significant changes in requirements that could adversely impact the environment;
- Appointment of a waste transport/disposal service provider that is not appropriately licensed;
- Failure to comply with waste storage/disposal requirements as identified by risk assessment and/or method statement;
- Failure to comply with chemical storage and/or handling requirements;
- Un-containable or uncontrollable spills of fuels or chemicals;
- Undertaken works outside the scope defined within the risk assessment and method statement; and,
- Discharge of untreated, contaminated wastewater to the environment.

All non-conformances identified during audits, inspections and monitoring activities will be recorded and followed up as non-conformity. Each non-conformance will be recorded utilising a developed reporting process. All non-conformances and near misses shall include the following information:

- Location and description of the non-conformance and the criteria/requirement that has been breached;
- The proposed corrective action including who holds responsibility for undertaking this action;

- The proposed preventative action to ensure against reoccurrence of the noncompliance;
- Any required monitoring and follow up; and
- Key performance indicators and a deadline for the successful completion of the corrective and preventive action.

The SPV-Project Company shall be made aware of all identified non-conformances immediately.

### **10.3 Corrective Action**

Any situation or condition that is non-conforming or otherwise poses an imminent risk to the environment, or social welfare should be immediately resolved. If a situation or condition cannot be corrected immediately, temporary measures such as necessary for the protection of the environment should be implemented.

All formally recorded observations and non-conformance will require corrective actions to be undertaken. Where non-conformances are raised, a corrective action plan will be developed by the respective non-conforming party. The corrective action plan shall include determination of root cause, proposed corrective actions (to correct the situation and prevent reoccurrence), timelines, required resources and any changes needed to ESMS documentation.

Records of implemented corrective actions shall be maintained.

## 11 Emergency Preparedness and Response

The likelihood of an E&S emergency or incident can be minimised by effective risk management planning and development of applicable response plans as part of an ESMS.

All risk assessments and method statements will need to include consideration of the potential for environmental incidents. Suitable incident response equipment should be maintained at appropriate locations on site and Project staff be suitably trained to use such equipment and respond to such emergencies.

The EPC Contractor and FM Co. will prepare and implement an Emergency Preparedness and Response Plan for construction and operations respectively.

The plan will identify procedures for reasonably foreseeable emergency situations that may relate to the Project. This will include drills at the Project site and any relevant training to specifically involved personnel, as well as use of required equipment for such circumstances. The plan will include site-based actions to take, requirements for co-ordination with the applicable external agencies (i.e. emergency services), as well as impacted stakeholders and statutory authorities in the instance that a pollution incident occurs.

When establishing the Emergency Preparedness and Response Plan, the following should be considered:

- What emergency situations are reasonably foreseeable related to the project type and project phase under consideration.
- The most appropriate method for responding to an emergency situation;
- Internal and external communication processes;
- The action required to prevent or mitigate E&S impacts;

The need for post-emergency evaluation to determine and implement corrective and preventative actions;

- Periodic testing of planned emergency response actions and required equipment;
- Training on emergency response and emergency equipment use;
- A list of key personnel and emergency services, including contact details (such as fire department, spillage clean-up services);
- Evacuations routes and assembly points; and
- The possibility of the need for mutual assistance from neighbouring organisations/projects.

### 11.1 Incidents

All E&S and OHS incidents, will be managed in accordance with the Project's incident management procedure to be established in the relevant management plan under the ESMS.

The EPC Contractor and FM Co. shall notify the SPV-Project Company immediately of any incidents. Notification shall include sufficient information to enable the SPV-Project Company to assess the severity of the incident, determine any regulatory or lenders notification requirements, and oversee the incident response process.

Where an incident presents an immediate or unacceptable risk to people, the environment, surrounding communities or Project assets, the EPC Contractor/FM Co. shall implement appropriate emergency response measures, including the suspension of affected activities where necessary, until the risks have been adequately controlled and authorisation has been provided to recommence works in accordance with the applicable procedures.

All incidents shall be subject to a formal investigation. The investigation shall identify the immediate, underlying and root causes of the incident and establish appropriate corrective and preventive actions to eliminate or reduce the likelihood of recurrence. Investigation findings proposed corrective actions and implementation timeframes shall be submitted to the SPV-Project Company for review and approval prior to implementation, unless immediate actions are required to protect life, property or the environment.

Corrective and preventive actions shall be tracked through to completion and shall not be considered closed until their implementation has been verified and accepted by the SPV-Project Company.

Lessons learned from incidents and investigations shall be communicated to relevant Project personnel and incorporated into risk assessments, management plans, training programmes and work practices, as appropriate.

## 12 Stakeholder Engagement

### 12.1 Stakeholder Engagement Overview

Stakeholder engagement can be described as a systematic effort to understand and involve stakeholders and their concerns in the Project activities and decision-making processes. Stakeholders are defined as any group or individual who can affect, or can be affected by, the Project.

The main objectives for stakeholder engagement are:

- To inform the relevant stakeholders about the Project;
- To capture views and concerns of the relevant stakeholders with regard to the project;
- To enhance ownership of the project within the host community;
- To provide a basis for stakeholder participation in impact identification and mitigation.

Consultation is not a single conversation but a series of opportunities to create understanding about the Project among those that are likely to be affected or might have an interest in it, and to learn how these stakeholders view the project and its related risks, impacts, opportunities, and mitigation measures. Listening to stakeholder concerns and feedback can be a valuable source of information to help identify environmental and social risks (real and perceived) and improve project management.

### 12.2 Stakeholder Engagement Plan (SEP)

**Note:** All processes relating to Stakeholder Engagement should refer to the Project Specific SEP.

A standalone SEP has been prepared, which will be implemented by the SPV-Project Company during construction and operations; however, certain elements may be delegated to other project parties such as the EPC Contractor and FM Company.

As a live document the SEP will need to be updated as and when is necessary to ensure the document remains valid with respect to the Project and the applicable stakeholders. The SEP includes a suitable grievance mechanism to allow local community complaints to be raised in a clear process.

### 12.3 Grievance Redress Mechanism

**Note:** All processes relating to Grievance Redress should refer to the Project Specific SEP.

It is to be noted that the SEP and the Grievance Redress Mechanism contained therein are the sole responsibility of the SPV-Project Company. Therefore, the SPV-Project Company will be responsible for the management of all internal and external grievances relating to Project related E&S activities throughout the PPPA period.

It is imperative to note that the Project SEP and the GRM do not account for the handling of clinical services related grievances, as that is explicitly the scope of the MoH. Therefore, the MoH will document and handle clinical related grievances in line with the current national regulations pertaining to healthcare services in Uzbekistan to which the Project nor the SPV-Project Company have no influence over.

#### 12.3.1 Worker Grievances

The SEP includes a grievance procedure for workers to raise workplace concerns. The procedure includes an appropriate level of management and address concerns promptly,

using an understandable and transparent process that provides timely feedback to those concerned, without any retribution. The mechanism allows for anonymous complaints to be raised and addressed.

The grievance mechanism must not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

All staff will need to be informed of the grievance procedure during their induction to the project and the procedure will be made readily available and easily accessible.

### **12.3.2 External-Party Grievances**

The SEP also includes a procedure for external party grievances that establishes methods to receive and register communications (e.g. from Interest based stakeholders). This includes:

- A method to screen and assess the issues raised and determine how to address them;
- A method to provide, track, and document responses, if any; and
- A method to adjust the ESMS management program, as appropriate, in response to external grievances.

The grievance procedure shall be reviewed and updated (as applicable) to ensure it remains scaled to the risks and adverse impacts of the project and include consideration of any affected stakeholders.

It must seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies.

## 13 Communication

The ESMS will establish, implement and maintain processes needed for internal and external communication relevant to environmental and social performance of the Project, relevant to the phase of the project and the allocated responsibilities.

Lines of communication relevant to the construction phase will be clearly defined within the CESMP whilst lines of communication relevant to the operational phase will be clearly defined within the OESMP.

- Associated processes will establish:
- What will be communicated;
- When it will be communicated;
- With whom to communicate;
- How to communicate; and
- By whom.

When establishing communication processes relevant to the ESMS, particular note will be made to

- Compliance obligations, including any reporting requirements to the environmental regulatory authorities; and
- Reporting requirements required by the Project lenders (i.e. as per ESAP or facility agreement).

All external communications will be managed and/or otherwise approved by the SPV–Project Company.

## 14 Data Management and Record Keeping

The implementation of the ESMS will generate data, that will be required to be managed. The appropriate management of records is a requirement of any successful ESMS and can be used to track progress, review effectiveness and demonstrate compliance.

The ESMS relevant to both the construction and operational phases should include the collation of the records including (but not limited to) the following:

- Project permits and related conditions;
- E&S Induction and training records;
- Relevant records of competence/qualifications of E&S/HSSE staff;
- Records related to the implementation of specific management plans, such as the SEP, GRM, etc.
- Grievance register and grievance records;
- Site observations record and tracker;
- Internal Audits reports;
- Third-party E&S Audit Reports;
- Non-Conformance Reports (including corrective action reports);
- Incident & Incident Investigation Reports;
- E&S Monitoring Results;
- Waste & Wastewater Management Company Licenses;
- Waste & Wastewater Manifest Forms and Chain of Custodies;
- E&S Risk Assessments and Method statements;
- Equipment Inspections/Certifications (such as calibration certificates);
- Record of emergency events.

The Project Company shall maintain data protection requirements applicable to its own employees, contractors, suppliers, stakeholders, and business operations. The EPC Contractor and FM Co. shall be required to protect personal information relating to their workers and service providers.

The MoH shall remain responsible for patient and clinical data under its control and shall apply its own policies and applicable legal requirements. Information exchanged between the parties for E&S management shall be limited to what is necessary, lawful, and proportionate, with appropriate confidentiality and data-security safeguards. No sensitive patient data or clinical operations will be shared between the Project parties.

## 15 ESMS Review

The ESMS will be 'living' and will need to be reviewed and updated in relation to changes in project circumstances, activities, environmental sensitivities and future requirements.

Examples of changes in project circumstances that may necessitate ESMS review and revisions include:

- Project design changes, modifications, expansions (if any);
- New E&S regulation or standards that apply to the Project;
- New/renewal permit conditions/conclusions of the national and local regulatory authorities;
- Updates to Project Lenders (if any) requirements that apply to the financing agreement, or Project ESAP updates;
- Changes in construction methods, commissioning or operational activities, which may change the type and level of impact on new or existing receptors and hence may necessitate an adaptive mitigation/management approach;
- Identification of new sensitivities in the Projects Area of Influence (AOI), requiring new or adaptive mitigation/management; and
- Corrective actions that are undertaken in response to results from monitoring, audits and inspection, which may require updates to ESMS documentation.

As a minimum, the ESMS will be reviewed on an annual basis (i.e. once a year) to ensure applicability to the risks, impacts and compliance obligations relating to the specific project stage. It is expected that where audit or incident corrective actions result in required updates, these will be made as and when they are identified.



# Appendix A Project's Legal Framework

## Fergana Eco City Regional Hospital

ESIA - Volume 3

Vision Invest

SLR Project No.: 777.24182.00001

11 August 2026

## International Conventions/Protocol

Uzbekistan is signatory to a number of effective international conventions pertaining to environmental management, social sustainability, climate change and human rights. The nationally binding E&S commitments enshrined in these accords will apply to the Project, as listed on the table below.

### International Protocols and Conventions

| Name of International Protocol/Convention                                                                   | Signed/Ratified                           | Relevance to the Project                                                                                                                                                                                                        |
|-------------------------------------------------------------------------------------------------------------|-------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| UN Framework Convention on Climate Change                                                                   | Accession: 20 June 1993                   | The Project will need to comply with all national standards for GHG emissions in order to contribute to Uzbekistan's targets.                                                                                                   |
| Kyoto Protocol to UNFCCC                                                                                    | Ratified: 12 <sup>th</sup> October 1999   |                                                                                                                                                                                                                                 |
| Paris Agreement to UNFCCC                                                                                   | Signed: 19 <sup>th</sup> April 2017       |                                                                                                                                                                                                                                 |
| Montreal Protocol on Substances that Deplete the Ozone Layer (with London, Copenhagen, Montreal amendments) | Accession: 10 <sup>th</sup> June 1998     | The Project will support Uzbekistan's contribution towards the protection of the ozone layer by refraining from use of ozone depleting substances.                                                                              |
| Vienna Convention on the Protection of Ozone Layer                                                          | Accession: 18 May 1993                    |                                                                                                                                                                                                                                 |
| UN (Rio) Convention on Biological Diversity                                                                 | Accession: 19 <sup>th</sup> July 1995     | The Project will implement mitigation and management measures to ensure conservation and protection of terrestrial ecology, if identified.                                                                                      |
| Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)                     | Accession: 10 <sup>th</sup> July 1997     | The Project staff and workers will be strictly forbidden from trading in any wild flora and fauna found in the Project site or outside the Project boundaries.                                                                  |
| Convention on Migratory Species of Wild Animals                                                             | 1 May 1998                                | The project will implement mitigation and management measures to ensure conservation of terrestrial and avian migratory species where identified.                                                                               |
| Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal           | Accession: 7 <sup>th</sup> February 1996  | The Project will be required to adhere to all national and international standards for hazardous waste generation and management.                                                                                               |
| United Nations Convention to Combat Desertification                                                         | Ratified: 31 August 1995                  | The Project will not result in accelerated desertification through sourcing of its materials and will contribute to sustainable development.                                                                                    |
| Paris Convention on Protection of the World Cultural and Natural Heritage                                   | Succession: 13 <sup>th</sup> January 1993 | The Project will implement mitigation and management measures where items/sites/monuments of cultural or natural heritage are identified within or near the Project boundaries and notify the relevant authorities immediately. |
| Stockholm Convention on Persistent Organic Pollutants                                                       | Accession: 28 <sup>th</sup> June 2019     | The Project will implement control measures to eliminate any use of chemicals under Annex A and B and reduce the unintentional release of those under Annex C.                                                                  |

In addition to the national labour requirements, the Republic of Uzbekistan has also ratified the following International Labour Organization (ILO) conventions.

### **ILO Convention Ratified by Uzbekistan**

| <b>ILO Conventions</b>                                                                                           | <b>Date Ratified</b>            |
|------------------------------------------------------------------------------------------------------------------|---------------------------------|
| Convention No 29 on Forced Labour adopted in 1930                                                                | 13 <sup>th</sup> July 1992      |
| Convention No 87 on Freedom of Association and Protection of the Right to Organise, adopted on 17th of June 1948 | 12 <sup>th</sup> December 2016  |
| Convention No 98 on the Right to Organise and Collective Bargaining adopted on 8th of June 1949                  | 13 <sup>th</sup> July 1992      |
| Convention No 100 on Equal Remuneration adopted 6th of June 1951                                                 | 13 <sup>th</sup> July 1992      |
| Convention 111 on Discrimination (Employment and Occupation) adopted 4th of June 1958                            | 13 <sup>th</sup> July 1992      |
| Convention 138 on Minimum Age adopted 6th of June 1973                                                           | 6 <sup>th</sup> March 2009      |
| Convention 182 on the Worst Forms of Child Labour adopted 17th June 1999                                         | 24 <sup>th</sup> June 2008      |
| Convention C105 on the Abolition of Forced Labour Convention, 1957                                               | 15 <sup>th</sup> Dec 1997       |
| C187 Promotional Framework for Occupational Safety & Health Convention, 2006                                     | 14 <sup>th</sup> September 2021 |
| C081 Labour Inspection Convention 1947                                                                           | 19 <sup>th</sup> Nov 2019       |
| Protocol 29 – to the Forced Labour Convention                                                                    | 16 <sup>th</sup> September 2019 |

## **Institutional Framework**

Key organisations with responsibility for environmental management in Uzbekistan are:

- Cabinet of Ministers of the Republic of Uzbekistan (COM).
- National Committee on Ecology and Climate Change (NCECC).
- The Centre for State Ecological Expertise, which is under the MEEPCC.
- The Cabinet of Ministers of the Republic of Uzbekistan governs the executive body in the Republic of Uzbekistan following the Constitution of the Republic of Uzbekistan (Article 98), and the Law of the Republic of Uzbekistan “On the Cabinet of Ministers of the Republic of Uzbekistan” (new edition of 2019).

The National Committee on Ecology and Climate Change (NCECC) is the main regulating body of state administration on environmental protection issues. The primary responsibilities of the NCECC include ensuring the implementation of a unified state policy on environmental safety, environmental protection, and the use and reproduction of natural resources; and enforcing state control over the compliance of ministries, state committees, departments, enterprises, institutions, and organisations, as well as individuals, with respect to the use and protection of land, mineral resources, water, forests, flora and fauna, and atmospheric resources.

The Centre for State Ecological Expertise's activities are directly related to the evaluation of materials for EIA and the issuance of documents determining compliance with environmental requirements for planned or executed business and other activities, as well as determining the admissibility of the implementation of the object of environmental expertise. They function under the MEEPCC.

Due to the cross-cutting nature of sustainable development and the environment, virtually all other state bodies have some responsibility towards them. Other Ministries, Departments and Agencies (MDAs) related to E&S impact management will also contribute to the Project.

### Main National Institutions and Roles

| Name of Institution                                                                                 | Main Role                                                                                                                                                                                                                  |
|-----------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>National Committee on Ecology and Climate Change</b>                                             | The National Committee is responsible for managing environmental monitoring for industrial facilities. It reviews and issues technical conditions for construction and operation of facilities, both planned and existing. |
| <b>Sanitary and Epidemiological Welfare and Public Health Service of The Republic of Uzbekistan</b> | Responsible for determining the Health Protection Zone (HPZ) under the Ministry of Health. The HPZ applicable for the Project is determined this government organisation.                                                  |

### Lenders Requirements

The Project developer is pursuing an amount of project finance from a number of Financial Institutions (FIs), which seek to mainstream environmentally and socioeconomically sustainable development planning through the evaluation and management of E&S risks associated with investment projects, in step with:

- Internal E&S policies, standards, and guidelines
- Industry-wide, voluntary E&S risk assessment and management frameworks drawing on well-developed and internationally accredited E&S performance standards

The E&S policies, frameworks, and performance standards applicable to the Project based on its prospective lenders, namely IFC, EBRD, and DFC are outlined in the following sub-sections.

### IFC Performance Standards

The IFC Performance Standards and World Bank Group EHS Guidelines are applicable on IFC financed Projects. The IFC Performance Standards (PS) (2012) are outlined below.

- PS1 - Assessment and Management of Environmental and Social Risks and Impacts;
- PS2 - Labour and Working Conditions;
- PS3 - Resource Efficiency and Pollution Prevention;
- PS4 - Community, Health, Safety & Security;
- PS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- PS7 – Indigenous People; and
- PS8 - Cultural Heritage.

**Note:** IFC PS5 on Land Acquisition and Involuntary Resettlement is not expected to be triggered by the Project. The site forms part of land that was previously under government control and designated for military use and has since been allocated for development as part

*of the Eco City masterplan. As such, the land has remained under state ownership and has not been subject to private or informal occupation.*

*As is outlined herein, based on site observations and available information, there is no evidence of current or historical land users, including residential, agricultural or livelihood-based activities within the Project footprint. The site is largely barren and has been subject to prior clearance and levelling, with access historically restricted due to its former military designation. Accordingly, the Project will not involve physical or economic displacement, land acquisition from private users, or restriction of access to land or resources.*

In addition to the IFC PSs outlined above, the following guidelines will be followed:

- IFC Good Practice Handbook on the Use of Security Forces: Assessing and Managing Risks and Impacts (2017);
- IFC Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets, 2007; and
- IFC Good Practice Handbook to Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets, 2013.

Performance Standard 1 outlines the need to “establish and maintain a process for identifying the environmental and social risks and impacts of the Project”. The standard further states that “The process may comprise a full-scale environmental and social impact assessment, a limited or focused environmental and social assessment, or straightforward application of environmental siting, pollution standards, design criteria, or construction standards”.

### WBG/IFC EHS Guidelines

The WBG/IFC EHS Guidelines with relevance to the Project include:

- WBG/IFC General EHS Guidelines (2007);
- WBG/IFC Health Care Facilities (2007);
  - **Note:** *Although not formally implemented, the WBG/IFC Health Care Facilities (2025 – Draft for Consultation) has been published and where relevant elements of this have been referenced herein.*

### European Bank for Reconstruction and Development (EBRD)

The applicable EBRD Environmental and Social Requirements (ESR) of 2024, are outlined below

- ESR1 - Assessment and Management of Environmental and Social Risks and Impacts;
- ESR 2 - Labour and Working Conditions;
- ESR 3 - Resource Efficiency and Pollution Prevention and Control;
- ESR 4 - Health, Safety and Security;
- ESR 5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
- ESR 6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- ESR 7 - Indigenous Peoples;
- ESR 8 - Cultural Heritage;

- ESR 9 - Financial Intermediaries; and
- ESR 10 - Stakeholder Engagement.

In addition to the above ESRs, the following Guidance Notes will be followed:

- Guidance Note on Grievance Mechanism, 2012;
- CDC, IFC and EBRD Addressing Gender-Based Violence and Harassment Emerging Good Practice for the Private Sector, 2020; and
- EBRD and IFC Workers' Accommodation: Processes and Standards, 2009.

In accordance with ESR 1, there is a requirement for EBRD financed projects to undertake an appropriate Environmental and Social Assessment to:

- identify and assess environmental and social risks and impacts of, and to the project;
- adopt a mitigation hierarchy approach to address environmental and social risks and impacts from project activities on workers, affected communities and the environment; and
- integrate human rights risks and impacts into the assessment and management process.

In addition, it outlines the requirement to:

- implement an Environmental and Social Management System (ESMS) commensurate with the environmental and social risks and impacts of the project in a manner consistent with the relevant ESRs, including monitoring and reporting provisions; and
- require continuous improvement of the client's environmental and social performance.

The EBRD is committed to promoting EU environmental requirements and is a signatory to the European Principles for the Environment (EPE), a joint statement by several international financial institutions. The principles endorse the European consensus on the importance of the fundamental right for present and future generations to live in a healthy and sustainable environment.

The Environmental Impact Assessment (EIA) Directive 85/337/EEC was adopted in 1985 and applied to a broad range of public and private projects. This Directive was subsequently amended and ultimately codified by Directive 2011/92/EU of 13 December 2011. It was later amended by Directive 2014/52/EU, which introduced key enhancements, including more robust consideration of health, climate change, disaster risks, and public participation.

According to Article 3 of Directive 2011/92/EU (as amended), the EIA must identify, describe, and assess in an appropriate manner, considering the specific characteristics of each project, the direct and indirect significant effects on the following factors:

- a) Population and human health;
- b) Biodiversity, with particular attention to species and habitats protected under Directives 92/43/EEC and 2009/147/EC;
- c) Land, soil, water, air, and climate;
- d) Material assets, cultural heritage, and the landscape; and
- e) The interaction between the factors referred to in points (a) to (d).

It is to be noted that at the time of writing this report, the proposed Project had not been classified and assigned a category.

## **Development Finance Corporation (DFC)**

The United States (U.S) Development Finance Corporation will be sought for Project finance, the applicable E&S requirements as per the Environmental and Social Policy Procedures (ESPP) of 2024 are outlined below.

The DFC is fully aligned with the E&S requirements specified as per IFC PS 1 and PS 2. The main objectives of the DFC's Commitment to Environmental and Social Sustainability as follows;

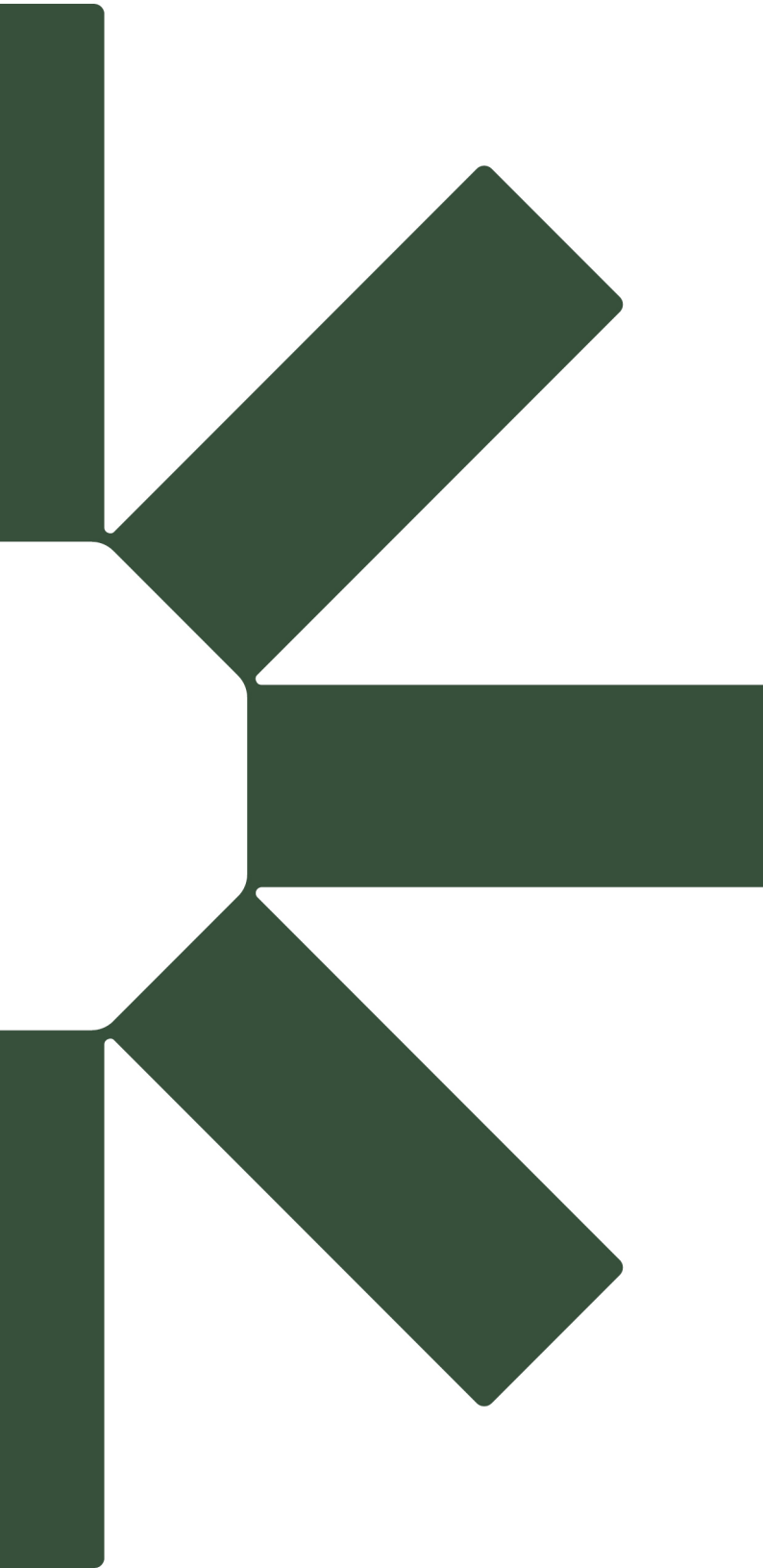
- Alignment with climate-resilient, low- and no-carbon economic development,
- Safeguard and, where feasible, enhance ecosystems and the biodiversity they support with the aim of achieving no net loss of biodiversity as well as to sustainably manage and use living natural resources,
- Assess and mitigate the risks of deforestation and other land conversion for investments in infrastructure development, agriculture, land use planning or zoning, and energy siting and generation,
- Promote inclusion and non-discrimination in the Project, particularly with respect to disadvantaged or Vulnerable Groups,
- Respect Human Rights, Labor Rights, and the rights of Project Affected People,
- Identify disproportionate gender-specific risks as well as gender-specific opportunities of the Project and take steps to mitigate the risks of exclusion, discrimination, and harm, including the risk of Gender-Based Violence and Harassment (GBVH),
- Undertake Meaningful Consultations with Project Affected People regarding Project activities, including engagement with Vulnerable Groups,
- Undertake Projects in a host country that is taking steps to adopt and implement laws that extend Internationally Recognised Worker Rights, and
- Ensure that Project Affected People are aware of and have access to Project-level grievance mechanisms for voicing complaints and seeking remedy for harm.

In addition to compliance with all applicable laws, at a minimum, DFC requires that all Projects meet the Performance Standards, applicable EHS Guidelines, and Labor Rights in accordance with DFC review.

The applicable supplement sector-specific requirements for health care facilities are as follows:

- All healthcare facilities must be certified by a local regulatory health authority and work toward obtaining satisfactory accreditation, and
- All facilities must maintain this accreditation, certification, or high-quality rating throughout the term of DFC support.

For the assessment of high-risk supply chain, the Project will conduct a screening of environmental and social impacts to assess the supply chain risks related to forced or child labour, significant health and safety issues, or conversion of critical habitat.



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