

Environmental and Social Action Plan – Cambodian Transmission Limited (CTL)

May 9, 2019

No.	Action	Deliverable	Deadline
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>			
1.	Revise emergency response plan: a) to specify that requirements are also applicable to the workers' accommodations at North Phnom Penh substation b) to reflect neighboring operator at the Kampong Cham substation	Updated emergency response plan	Within 30 days of Contract Effective Date
2.	Update the corporate social responsibility procedure for external communications: a) to include stakeholder mapping b) to ensure consistency of the external grievance procedure with other procedure documentation (e.g., patrolman procedures, etc.)	Updated corporate social responsibility procedure for external communications	Within 60 days of Contract Effective Date
3	CTL policy to specify that CTL is committed to comply with the applicable laws and regulations.	Revised CTL Policy	Within 60 days of Contract Effective Date
4	Ensure all applicable requirements specified in the Safety Manual are now transferred to the Health and Safety Manual dated 5 <sup>th</sup> December 2018 (ref CTL-OHSMS-HSE-010).	Revised health and safety manual	Within 60 days of Contract Effective Date
<b>PS 2: Human Resources</b>			
3.	Update internal rules and regulations (human resources procedures): a) to reflect requirements of PS 2, including for example addressing forced labor, equal opportunity, nondiscrimination, sexual harassment, freedom of association and collective bargaining, etc. b) retrenchment in accordance with national laws	Revised internal rules and regulations	Within 120 days of Contract Effective Date

4.	Strengthen an internal grievance mechanism in compliance with PS 2.	Internal grievance mechanism	Within 60 days of Contract Effective Date
5.	Improve hygiene standards at the workers' accommodations	Revised health and hygiene procedure and inspection forms for workers accommodations, and photographic evidence of improvements	Within 30 days of Contract Effective Date
6.	Revise health and safety manual and safety procedures to include procedures for working over waterbodies, working near electric and magnetic fields, grass fires, etc.	Revised health and safety manual and safety procedures	Within 60 days of Contract Effective Date
7.	Develop policy which includes requirements for ensuring third parties are reputable and legitimate enterprises and have an appropriate environmental and social management system	Third party policy	Within 60 days of Contract Effective Date
<b>PS 3: Resource Efficiency and Pollution Prevention</b>			
8.	Improve hazardous materials storage (e.g., provide secondary containment of at least 110% volume of stored liquids, provide spill kits, etc.)	Photographic evidence of improvements carried out at substations	Within 60 days of Contract Effective Date
9.	Develop waste management plan which includes as a minimum disposal/recycling options for various waste streams, chain of custody requirements for transportation and disposal, identification of hazardous waste streams, etc.	Waste management plan	Within 90 days of Contract Effective Date
<b>PS 4: Community Health, Safety and Security</b>			
10.	Revise health and safety manual and safety procedures to include topics related to community health and safety matters (e.g., electrocution).	Revised health and safety manual and safety procedures	Within 60 days of the Contract Effective Date
11.	Revise security management plan to reflect training requirements for third party security providers	Revised security management plan	Within 30 days of Contract Effective Date
12.	Revise external grievance mechanism to address security-related grievances	Revised external grievance mechanism	Within 60 days of Contract Effective Date

<b>PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>			
13	<p>Prepare a bird and bat evaluation risk Report which includes the following:</p> <ul style="list-style-type: none"> <li>• Information based on CTL observation of bird nesting in the transmission line towers, bird/bat carcasses near the transmission line / towers which could have died by electrocution or entanglement, and bird/bats observed during the operation of the Asset;</li> <li>• A figure/map showing the location of important bird areas i.e. RAMSAR sites in relation to the Asset, environmentally protected areas, etc.</li> <li>• Any additional evidence why CTL consider bird and bat collisions/electrocutions to be low risk e.g. built in design mitigation which could minimize collisions and electrocutions, location of the project, etc.</li> </ul>	CTL Bird and Bat Evaluation Risk Report.	Prior to MIGA Board Report
14	<p>CTL to engage an independent local bird/bat consultant to provide a desktop review of bird/bat sensitivity in the Project area. The consultant to review and advise on the monitoring measures in the Patrolling of Transmission Line Procedure.</p>	Independent Local Bird/Bat Consultant Risk Evaluation Report.	Within 180 days of Contract Effective Date