

Annex 1. Environmental and Social Action Plan

No.	Action	Timeline
PS 1 Assessment and Management of Environmental and Social Risks and Impacts		
1	Develop and implement an Environmental and Social Management System (ESMS) in line with PS1 requirements for the construction and operation phases. The EMS will include the following elements: (i) policy; (ii) identification of risks and impacts; (iii) management programs; (iv) organizational capacity and competency; (v) emergency preparedness and response; (vi) stakeholder engagement; and (vii) monitoring and review.	Within 90 days of the Effective Date of the CoG
2	<ul style="list-style-type: none"> a) Develop occupational health and safety (OHS) and social management plans for Nakheel operations. b) Require O&M Contractor to develop OHS Management Plan for the rooftop solar plant operations. 	Within 90 days of the Effective Date of the CoG
3	Update Environmental Risk Register and the Operational Environmental Plan to include changes in Nakheel's activities, new acquisitions and expansions, as well as social and health and safety issues.	Within 90 days of the Effective Date of the CoG
4	Appoint a qualified Health, Safety and Environment (HSE) staff in addition to Quality Manager to manage E&S and H&S risks	Within 60 days of the Effective Date of the CoG
5	Require O&M contractor to appoint Health, Safety and Environment (HSE) staff to manage solar plant E&S risks and impacts in line with the requirements of MIGA PSs.	Within 60 days of the Effective Date of the CoG
6	Develop a Stakeholder Engagement Plan for the Project, in line with the requirements of the MIGA PSs.	Within 90 days of the Effective Date of the CoG
7	Update the Grievance Mechanism Policy to account for grievances related to gender-based violence (GBV) and sexual harassment.	Within 90 days of the Effective Date of the CoG
PS 2 Labor and Working Conditions		
8	<ul style="list-style-type: none"> a) Develop an Anti-Harassment Policy which will cover harassment and GBV at the workplace. b) Update training plan to include periodical training on GBV for Nakheel staff. c) Update Employees Grievance System to account for GBV risks. 	<ul style="list-style-type: none"> a) Within 60 days of the Effective Date of the CoG b) Within 90 days of the Effective Date of the CoG c) Within 60 days of the Effective Date of the CoG
9	<ul style="list-style-type: none"> a) Equip pesticides storage and mixing areas with eyewash stations, equip first aid kits with the content suitable to handle injuries related to pesticide exposure. b) Provide additional training on responding to H&S and environmental accidents related to hazardous materials handling. 	Within 30 days of the Effective Date of the CoG
10	<ul style="list-style-type: none"> a) Develop a Supply Chain Policy in line with MIGA PSs to ensure that potential suppliers and services are screened against the risks of forced and child labor. 	Within 90 days of the Effective Date of the CoG

PS 3 Resource Efficiency and Pollution Prevention		
11	Update current procedures and practices to ensure that they comply with the WBG EHS Guidelines in terms of storage, handling, application and disposal of pesticides and other hazardous substances including: a) Waste Management Plan b) Farm Management Procedure	Within 60 days of the Effective Date of the CoG
PS 4 Community Health, Safety and Security		
12	Develop Security Procedure to include: i) screening of security contractors for past involvement in crimes/ abuses related to sexual harassment and GBV; ii) training of security personnel on the requirements of the Nakheel's anti-harassment and the Equality and Diversity policies and the; iii) the roles and responsibilities of security staff in grievance redress; iv) training of security personnel in human rights (including combatting GBV; v) rules of engagement and use of force, and; vi) responsibilities of Nakheel staff and resources, such as dedicated personnel to oversee the management of security at Nakheel and its farms	Within 90 days of the Effective Date of the CoG
PS 7 Indigenous Peoples		
13	a) Include specific provisions for culturally appropriate consultations with Bedouin communities in the Stakeholder Engagement Plan. b) Engage with qualified third party to identify development opportunities for Bedouin communities and screening measures to prevent potential impact that will be included in the Social Management Plan	a) and b) Within 90 days of the Effective Date of the CoG