

**Environmental and Social Action Plan – Tunisia Solar Round 1 – Kairouan Project
(January 2023)**

Number	Action	Deliverable	Deadline
PS 1			
1	AMEA will update its Integrated Management System (IMS) to include its applicability to all contractors and sub-contractors	Submit revised IMS acceptable to Lenders	1- April-2024
2	The EPC and O&M contractors will develop and implement a project specific EHS/OHS management system including all relevant construction ESMPs, including detailed risk assessment procedures and a chance find procedure, in accordance with ESIA findings, relevant PSs and applicable WBG’s EHS Guidelines, in line with the objectives of AMEA’s policies, ISO certifications (e. g. 14001 and 45001), project manual and ESIA provisions. The project’s ESMS will detail processes and standards, covering EHS and OHS elements, to be implemented during construction to provide adequate management and supervision of all E&S issues	a) Submit construction ESMP approved by AMEA and acceptable to Lenders b) Submit operations ESMP approved by AMEA and acceptable to Lenders	a) Before Construction 1-April-2024. b) Before Operation 31-June-2025.
3	The project will establish an EHS/OHS coordination procedure with STEG aimed at achieving compliance with the IFC PSs during construction and operations of the OHTL. The procedure will detail the type and frequency of the engagement and the proposed steps the project will take to ensure STEG and its selected EPC and subcontractors comply with relevant PSs standards and WBG General and sector specific EHS guidelines with particular focus on PS5 and PS6 identified issues	Coordination procedure/protocol with STEG was submitted for review and approval	Before Construction 1-April-2024.
4	Finalize the project related EHS organogram for both AMEA and KSP and selected EPC and O&M contractors. Appointed personnel will have adequate qualifications and experience and sufficient authority and resources to fulfil their responsibilities as required by the project ESMS, IFC requirements, the ESAP and local regulation	Submit updated HSE organogram	1-April-2024
5	The company will require their EPC and O&M contractors (including their sub-contractors) to appoint suitably qualified environmental, labor, social and OHS teams to manage their scope of work.	Submit updated HSE and OHS organograms	1- April-2024
6	AMEA/KSP and the EPC and O&S contractors will develop a project specific Emergency Preparedness and Response Plan (“EPRP”) in accordance with IFC PS1 and PS4 provisions.	Submit Operations project EPRP acceptable to Lenders	Before Construction 1-April-2024. Before Operation 31-June-2025.

PS 2			
7	<p>Guided by the requirements defined in the relevant IMS procedures and the project ESMS manual and consistent with the requirements of host nation law and PS2, develop for the construction and operations phases, project specific i) Labor Policy statements; ii) HR procedures; iii) Workers Code of Conduct; iv) Labor Grievance Mechanism; and v) a workers accommodation management plan, if needed.</p> <p>These HR policies and procedures, Code of Conduct and Labor Grievance Mechanism will apply to all project workers including those employed by any contractors and sub-contractors and will be translated into French and Arabic (or as relevant), readily accessible and clearly communicated at induction and through the provision of additional sensitization and training.</p> <p>The EPC and O&M contractors' processes and procedures will be aligned with the Project policies, plans and procedures and the HR function is adequately staffed with experienced personnel.</p>	<p>Submit i) policies (on non-discrimination and equal opportunity, prevention of child labour and forced labour, freedom of association, and prevention of Gender Based Violence and Harassment - GBVH); ii) procedures (including local recruitment with provisions for increasing gender equality, worker induction, terms and conditions of employment, disciplinary requirements including in relation to GBVH, and demobilization of the project workforce following completion of construction; iii) Workers Code of Conduct to account for respectful worker behavior including zero-tolerance provisions against GBVH; and iv) Labor Grievance Mechanism with provisions to enable the receipt and resolution of grievances including gender-related issues such as GBVH and gender-based discrimination, in a sensitive and confidential manner; and v) workers accommodation management plan, acceptable to Lenders.</p>	<p>Before Construction 1-April-2024.</p> <p>Before Operation 31-June-2025.</p>
8	<p>KSP will incorporate or require the EPC Contractor to incorporate the provisions related to child labor and forced labor in each contractual agreement it or the EPC contractor enters into with a solar supplier;</p>	<p>Share the contracts EPC and suppliers containing the provisions related to child labor and forced labor</p>	<p>Prior to signing contracts with the EPC</p>
9	<p>KSP will put in place appropriate monitoring requirements including third-party audit procedures for both the construction and operation phases, to ensure contractors and their sub-contractors maintain statutory compliance with</p>	<p>Submission of monitoring requirements acceptable to Lenders</p>	<p>Before Construction 1-April-2024.</p> <p>Before Operation 31-June-2025.</p>

	host country law, the employers labor requirements, and PS2 provisions.		
PS3			
10	Develop a project specific water management plan, based on ESIA baseline findings and sustainability assessment, for the construction and operational phase which will include measures for efficient water use/water minimization including monitoring procedures of water supply service.	Submission of water management plans acceptable to Lenders	Before Construction 1-April-2024. Before Operation 31-June-2025
11	The company and its EPC and O&M contractors will develop a waste management plan for the project aligned with local legal requirements, AMEA/KSP EMS guidelines, IFC PS3 and WBG's EHS general provisions. The waste management plan will commit to the reduction of wastes whilst maximizing the re-use and recycling of materials and will outline process for appropriate waste storage, segregation, tracking, transportation and disposal / treatment Provisions will be included to fully track waste from source to final destination and for selecting third parties hired for waste transport. The plan will also include specifics for management of broken, expired or surplus PV panels, address local requirements for the designation of a hazardous storage area, provide details on hazardous waste disposal solution(s), in line with good international industry practices (GIIP), and includes provisions to ensure hazardous waste contractors are licensed from the local relevant authority.	Submission of waste management plans acceptable to Lenders	Before Construction 1-April-2024. Before Operation 31-June-2025.
12	The company and its contractors will develop a project hazardous material management plan and spill prevention and repose plan that are commensurate with the potential risk present.	Submission of waste management plans acceptable to Lenders	Before Construction 1-April-2024. Before Operation 31-June-2025.
PS 4			
13	Develop a Community Health and Safety and Worker Influx Plan, inclusive of COVID-19 provisions.	Submission of a Community Health and Safety and Worker Influx plan acceptable to Lenders	1-April-2024
14	Develop a Project Traffic and Transport Management Plan. The plan will define transport routes to be used for equipment deliveries based on Transportation Risk Assessment undertaken to evaluate road traffic and conditions with aim of minimizing impacts.	Submission of Transportation Risk Assessment and Traffic and Transport management plan acceptable to Lenders	Before Construction 1-April-2024. Before Operation 31-June-2025.

15	Develop a Security Management Plan (“SMP”) for the construction and operations phases, based on requirements of the IMS Security Assessment and Management Procedure and the findings of the Security Risk Assessment. The SMP will be consistent with PS4 requirements including IFC’s “Good Practice Handbook on the Use of Security Forces: Assessing and Managing Risks and Impacts” and the Voluntary Principles on Security and Human Rights	Submission of Security management plan acceptable to Lenders	Before Construction 1-April-2024. Before Operation 31-June-2025.
PS 5			
16	Develop and implement in collaboration with the local authorities, a Rangeland Grazing Livelihoods Restoration Plan.	Submission of Grazing Livelihoods Restoration Plan acceptable to Lenders	31-June-2025
17	Undertaken a supplementary assessment to i) describe the land acquisition and compensation processes undertaken by STEG; ii) identify gaps against the requirements of IFC PS 5; and (iii), if necessary, develop and implement measures to address any gaps identified.	Submission of supplementary assessment acceptable to Lenders	31-June-2025
PS 6			
18	The company and its EPC will develop a construction- and operational phase Biodiversity Management Plan (BMP) that will be designed to achieve no net loss of Natural Habitat and associated significant biodiversity values with appropriate mitigation measures to preserve the integrity of topsoil and existing natural vegetation on-site and restoration of natural vegetation in areas disturbed during construction.	Submission of Biodiversity management plan acceptable to Lenders	Before Construction 1-April-2024. Before Operation 31-June-2025.
19	Engage with STEG, with the aim to install and maintain bird flight deflectors for the life of the project to include a combination of flapper-style and spiral bird diverters to be installed at 10-meter intervals.	Coordination procedure/protocol with STEG was submitted for review and approval.	1-April-2024
Stakeholder Engagement			
20	Update the SEP to account for further engagement and sensitization activities to be undertaken as part of the disclosure of the ESIA and prior to the construction phase with community members (including women and youth) from the six nearby.	Submit updated SEP acceptable to Lenders	1-April-2024
21	Establish a project level Community Grievance Mechanism (“CGM”) prior to the start of the construction phase and for the duration of the project in line with PS1 requirements	Submit CGM acceptable to Lenders	1-April-2024