

ENVIRONMENTAL and SOCIAL ACTION PLAN

Final

No.	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, IFC PSs, Best Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*
PS1 – Assessment and Management of Environmental and Social (E&S) Impacts and Issues						
1.1	<p>Monitoring and reporting</p> <p>Prepare monitoring reports from the signing date of loan agreement that include the status of ESAP implementation, and compliance with lenders' requirements in a timely manner. The frequency of reports will be as follows:</p> <ul style="list-style-type: none"> ▪ Environmental and Social Progress Report (Quarterly E&S Monitoring Reports to lenders) ▪ Monthly Construction progress report to lenders ▪ Monthly Internal RAP Monitoring Reports as per RAP <p>Ensure that the EPC prepares monthly EHS monitoring reports for the SPV.</p> <p>Support and provide input for the delivery of the below reports on E&S progress by other advisors and consultants:</p> <ul style="list-style-type: none"> ▪ IESC's quarterly E&S Construction Monitoring Reports ▪ IESC's bi-annual E&S Operation Monitoring Reports ▪ Quarterly external RAP Monitoring Reports by independent consultant ▪ RAP Completion Audit by independent consultant ▪ Labour audits by independent labour consultant (frequency to be confirmed following initial labour audit concluded by January 2026 – annual unless major non-compliances observed.) 	Timely management of E&S risks and issues, accountability and effective governance.	IFC PS1 EP4 Principle 9, 10 IFC PS2 IFC PS5 AIIB ESS1	SPV	Throughout Project lifecycle	E&S reports prepared and delivered on time and to the satisfaction of lenders.
1.2	<p>ESIA update – Noise and vibration</p> <p>Integrate the results of the baseline noise measurements and associated modelling into the final ESIA.</p>	Management of ESHS risks in accordance with national and Lenders' requirements, and international best practice.	IFC PS1, EP4 Principle 2 AIIB ESS1	SPV	Q1 2026	Final ESIA with updated baseline and assessments.
1.3	<p>ESIA Update – Air Quality</p> <p>Integrate the results of the continuous one-week PM₁₀ and PM_{2.5} measurements and associated modelling into the final ESIA and update the air quality modelling as per lenders comments.</p>	Management of ESHS risks in accordance with national and Lenders' requirements, and international best practice.	IFC PS1, EP4 Principle 2 AIIB ESS1	SPV	Q1 2026	Final ESIA with updated baseline and assessments.
1.4	<p>ESIA update - Biodiversity</p> <ul style="list-style-type: none"> ▪ Explicit detail should be provided on how design has avoided the most sensitive habitats (i.e. through the use of viaducts, etc.). The use of habitat maps and the project design should be adopted to illustrate this. 	<p>Reputational risks associated with biodiversity.</p> <p>Non-compliance with Lender standards and GIIP.</p>	IFC PS6 EP4 – Principle 2 AIIB ESS1	SPV	Prior to FC	Final ESIA with updated baseline and assessments.
1.5	<p>ESIA update – Social</p> <p>Provide further data on seasonal migrant workers known to be working and living in the region, such as Syrian or Afghan refugees. Estimated numbers of these vulnerable groups should be established, potential impacts assessed, and</p>	<p>Reputational risks.</p> <p>Non-compliance with Lender standards and GIIP.</p>	IFC PS1 EP4 – Principle 2 AIIB ESS1	SPV	By end Q1 2026	Final ESIA, and relevant management plans as required, with updated baseline, assessments and mitigation measures.

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	mitigation measures identified in ESIA and the relevant management plans (MPs) (e.g., SEP, RAP, HR-LMP, CHSMP).					
1.6	<p>ESIA Update – Cultural Heritage</p> <ul style="list-style-type: none"> ▪ Include explicit cross-reference to the ARHB permit tracking mechanism provided in the CHMP (refer to applicable Annex and Table). Updates to the current permitted status of archaeological sites are noted, however these need to be thoroughly checked throughout the ESIA report / heritage package – for example, Table 10 refers to the permit status of HRM 37 as “pending”, whereas Table 11 suggests the HRM 37 permit is “obtained” with “excavations ongoing”. Ensure this is checked and updated accordingly / throughout. ▪ The Noise and Vibration Chapter update (Sept 2025) suggests a potential for air shock and fly rock impacts on heritage receptors, including Registered archaeological sites, which is not currently referred in the Cultural Heritage assessment (or related mitigation). Chapter XIII must be updated to align with the findings of the vibration assessment model to appropriately consider these additional (and in-combination) impacts that are predicted to occur, presenting supplementary mitigation and management, as needed. The ESIA Chapter XIII has been updated to consider the full suite of “cultural heritage resources” in alignment with Lender standards (including intangible and tangible cultural heritage – the latter including archaeological and immovable heritage). To better reflect this content / compliance it is suggested that the title of Chapter XIII (and introductory paragraphs, other section headings as necessary) is updated accordingly. ▪ The updates to headings etc. should include a check of table headings – for example, Table 8 lists the 60 Tangible Cultural Heritage Resources within the Baseline Study Area, yet the title refers to the Antalya Province (rather than the Project area) and consequently is misleading. The ESIA Chapter XIII must be reorganised to align with the Lender assessment process: 1) baseline description & valuation 2) direct and indirect Project impacts 3) assessment of impact significance 4) mitigation and management requirements 5) residual effects. This progression is required to show how significant impacts may be, and how mitigation has been assigned accordingly. To make this step-by-step process clearer, it is requested that any discussion of Project impacts and mitigation is removed from the “Baseline Conditions” Section “XIII.2.3 Tangible Cultural Heritage” which currently includes both a baseline site description and some limited discussion of likely impacts and mitigation. Section XIII.2.3 should detail baseline characterisation (and site value / significance / designated status), only. ▪ The impact assessment has been partly updated to consider both direct and indirect impacts. The Project activities that generate these impact types are not currently described and should be detailed in the relevant assessment section (linked to the Project Description) e.g., Section XIII.3.1 Land Preparation and Construction (and the supporting summary Table XIII.10). This could align with the bulleted format presented for Intangible Cultural Heritage impacts during Operations, in Section 3.2 for example. ▪ The incorporation of the IFC categories of heritage valuation is noted in the revised Cultural Heritage Chapter XIII. It must be acknowledged in Table XIII.4 that sites afforded national designation (1st & 2nd Degree) may also meet the “non-replicable” criteria (which is later applied to several resources within the Project corridor - within Table XIII.10 - e.g., HRM-10; HRM-38; HRM-46; HRM-47 & HRM-52). 	<p>Reputational risks associated with cultural heritage loss. Non-compliance with Lender standards and GIIP.</p>	<p>IFC PS 8 EP4 – Principle 2 AIB ESS1</p>	<p>SPV, supported by Project Cultural Heritage Team</p>	<p>Prior to FC</p>	<p>Final ESIA with updated baseline and assessments (including Cultural Heritage Annex).</p>

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	<ul style="list-style-type: none"> ▪ Table XIII.10 needs to be thoroughly checked for errors and inconsistencies. These are critical to understanding the mitigation process (and related IFC compliance). For example, HRM 6 “distance from the route” is stated as “NA” despite the “explanation” describing “overlap”, with the Registered area requiring targeted trenching (pre-Construction). Additionally, the Permit status of this (1st Degree) site is not specified. Several other sites are also with an “NA” entry under “distance from the route”. ▪ Table XIII.10 should be renamed to clarify that it only assesses potential impacts that may result from the construction phase (only). It should therefore include Direct and Indirect impacts (e.g., vibration / visual) and clarify that the Impact listed in the colour coded column is a pre-mitigation impact (with occasional references to mitigation removed from the “explanation” column). ▪ The impact colour code used in Table 10 should be checked and clarified against the criteria listed e.g., HRM 10 is a 1st degree registered and non-replicable archaeological site within the Project route – so why is the impact ‘green’? ▪ Table 10 should also be updated to show the individual site (baseline) cultural heritage value or site significance (to inform the determination of impact significance) ▪ The discussion on “high risk archaeological areas” / Table XIII.11 should be updated to confirm these are pre-construction mitigation commitments (i.e., Project works cannot commence in these areas until archaeological works have been completed). ▪ Where impacts on graves / cemeteries are briefly discussed (before the Grave Relocation Plan summary) this should describe the activities that may result in impacts to graves (direct and indirect) with reference to the site value and sensitivity (i.e., high), cross-referring to the additional details provided in Table 10 – the current wording suggests Project impacts on cemeteries are “minor”, which is incorrect (given they are highly sensitive and relocation will be necessary). ▪ The Chapter XIII commitments regarding ongoing PAP surveys (on Intangible Cultural Heritage) and ARHB engagement (on Mitigation and Monitoring) should include cross reference to the programme schedule outlined in the SEP and reflected in the CHMP (and vice-versa). <p>Table XIII.14 needs to be thoroughly checked for errors and inconsistencies. For example, air, dust and visual impacts are categorised as ‘physical impact’ yet they are indirect and non-physical (and secondary to the physical impact generated by the Project activity e.g., blasting generates noise, excavation generates dust). A low residual impact is still an impact (and that should be updated in the relevant column). Additionally, Non-replicable and Registered resources are not of ‘low’ sensitivity / cultural heritage value (e.g., HRM-10, which is a 1st Degree settlement site) - this will need to be checked for all receptors. Once documents are updated as per these requirements, a thorough check is required across the entirety of the Cultural Heritage package (ESIA, Annex, Management Plan and supporting appendices) to ensure consistency in mitigation status and site-specific actions – ongoing or planned, within associated Management Plans (including Blasting, Noise and Vibration, SEP)</p>					
1.7	Disclosure of final ESIA (including updated management plans)	Compliance with international standards. Support informed public participation.	IFC PS1 EP4 Principle 4	SPV	Following completion of actions 1.2 to 1.7	Link to final, disclosed ESIA shared with lenders

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	Once finalised, disclose final ESIA (both in Turkish and English) and share the link with lenders.		AIIB ESS1			
1.8	Organisational Capacity <ul style="list-style-type: none"> Continue hiring as needed to provide adequate and competent resources throughout the construction and operation phases of the Project. Update the Project Organogram to provide lines of communication and reporting between the EPC Contractor and the SPV, as well as interactions with KGM as appropriate. 	Increasing capacity and competency to manage social performance of the Project.	IFC PS1 EP4 Principle 4 Best practice. AIIB ESS1	SPV & EPC	Within monitoring period, prior to Q2 2026	Updated ESHS Organogram with key roles and including reporting lines between SPV and EPC and KGM as appropriate.
1.9	Project ESMP 1.3.1 Update the Project ESMP to: <ul style="list-style-type: none"> Include cost estimates for implementation and ongoing monitoring. 1.3.2 Implement Project ESMP with regular updates provided in monitoring reports 1.3.3 Compulsory training on ESMP and its modules to be provided to concerned employees during construction and operation phase	Management of ESHS risks through a management plan in accordance with and Lenders' requirements and international best practice.	IFC PS1 EP4 – Principle 2 & 4 AIIB ESS1	SPV & EPC	1.3.1 Within monitoring period, prior to Q2 2026 1.3.2 Throughout Project lifecycle 1.3.3 Throughout Project lifecycle	Updated ESMP. Ongoing implementation of the Project ESMP including monitoring and reporting. Training records.
1.10	Operation Environmental and Social Management Plan (OESMP) Develop and implement an operation phase Environmental and Social Management Plan (OESMP) at least six months prior to the start of the operation phase. The OESMP should comprise: <ul style="list-style-type: none"> Waste Management Plan Noise Management Plan Emergency Preparedness and Response Plan Labour Management Plan Occupational Health and Safety Plan Community Health and Safety Management Plan Traffic and Road Safety Management Plan (including maintenance requirements and hard and soft safety interventions) Sub-contractor Management Plan Hazardous Materials Management Plan Security Management Plan 	Management of ESHS risks through an approved OESMP in accordance with and Lenders' requirements and international best practice.	IFC PS1 EP4 – Principle 2 & 4 AIIB ESS1	O&M Contractor / SPV	6 months prior to the start of operation phase Implementation throughout operation phase	Operation phase management plans.
1.11	Audit of early construction works Corrective actions identified within the Construction Progress Report should be actioned according to the identified timeframe and included in the first E&S quarterly monitoring programme for assessment.	Address ESHS risks associated with early construction works and fully align Project with international standards.	IFC PSs EP4 Principle 4 AIIB ESS1 and ESS2	SPV and EPC	Within first quarterly monitoring period	Closed out action within the Corrective Action Plan.
1.12	Stakeholder Engagement Plan 1.12.1 Update the SEP with the following: <ul style="list-style-type: none"> Based on the community feedback received during the ESIA disclosure meetings, expand and update stakeholder engagement programme with 	Timely dissemination of Project E&S issues, minimising negative feedback by proactive	IFC PS1, EP4 Principle 5 AIIB ESS1 and ESS2	SPV supported by EPC involving CLOs	1.12.1 Prior to FC 1.12.2 Throughout project	Updated SEP with updated stakeholder engagement programme, community

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	<p>increased number of regular public meetings and updates (at least monthly) on project progress and implementation of Project's E&S implementation, including RAP measures;</p> <ul style="list-style-type: none"> ▪ Ensure the stakeholder engagement programme covers (i) ongoing Antalya Regional Heritage Board engagement on monitoring and assurance of vibration impacts; (ii) engagement with PAPs on cemeteries and intangible cultural heritage and (iii) consultation programme for noise and vibration impacts, including notification process for blasting activities. ▪ As an appendix to the SEP, prepare and share (i) community information brochures in local and other languages of affected communities as defined in ESIA (Turkish, Kurdish and Arabic), (ii) guides for land acquisition and compensation (GLACs) for ongoing consultation and engagement on RAP; and ▪ Include reference to AIIB's standards and AIIB's Project-affected People's Mechanism as an additional tier apart from the Project's community grievance mechanism. <p>1.12.2 Implement the SEP, engaging with the public to provide regular updates (at least monthly) and as required with individual groups, maintain all records of stakeholder and community engagement meetings as per SEP, including details and gender breakdown of attendees in consultation meetings.</p> <p>1.12.3 The SEP is to be updated when material changes occur in Project and as a minimum reviewed and updated annually.</p> <p>1.12.4 Review and update the Policy Information on Confidentiality and Security to allow environmental and social performance updates and ESIA disclosure and specify disclosure procedures for environmental and social updates on the Project, when needed.</p>	<p>and continuous communications with all affected parties including relevant stakeholders.</p>			<p>cycle.</p> <p>1.12.3 Every year after FC.</p> <p>1.12.4 Throughout project cycle.</p>	<p>information brochures and GLAC disseminated in the languages of affected people.</p> <p>Stakeholder engagement logs and regular minutes shared.</p> <p>Feedback and comments recorded after annual stakeholder engagement meetings.</p> <p>GLAC reviewed by IESC and disseminated by SPV.</p> <p>Updated Policy Information on Confidentiality and Security, if and when needed.</p>
1.13	<p>Community Grievance Mechanism</p> <p>Implement the Grievance Mechanism (GM), which includes the following at a minimum:</p> <ul style="list-style-type: none"> ▪ Continue to disseminate contact person (CLO) and details for community grievance channels, including anonymous submission, appeals committee procedures and procedures to submit sensitive grievances (i.e., GBVH); ▪ Implement grievance logs and monitor grievances over 30 days. ▪ Ensure training on handling sensitive grievances are provided by competent gender experts; ▪ Prepare and Implement an Appeals Committee operations manual, and assign the Committee responsibility for GM oversight, including clarifying the appeals process (scope, triggers, timelines) and linking grievance trends to RAP/LRP monitoring; ▪ Integrate and implement the GM into all stakeholder engagement tools; ▪ Ensure GM visibility in project materials and public events; ▪ Conduct targeted outreach to vulnerable and remote groups (particularly for land acquisition process); and ▪ Demonstrate the GM process during public meetings. 	<p>Minimisation of grievances through a formalised and well communicated system.</p> <p>Avoidance and minimisation of reputational risks and risks related to mistrust, unresolved grievances and poor outcome tracking.</p>	<p>IFC PS1</p> <p>IFC PS5</p> <p>EP4 Principle 6</p> <p>AIIB ESS1 and ESS2</p>	<p>SPV and EPC</p> <p>With support of CLOs</p>	<p>Throughout Project lifecycle</p>	<p>Outreach activities conducted.</p> <p>Materials that include details of where project GM distributed.</p> <p>Public consultations completed.</p> <p>Recorded appeals process and evidence of appeals committee being engaged.</p> <p>Grievance log that disaggregates data on land acquisition.</p> <p>Engagement logs.</p>
1.15	<p>Permits and Licences</p> <p>Maintain the permits register for the Project to keep track of the necessary permits, their validity periods, the issuing authorities and special conditions/requirements for</p>	<p>Governance of ESMS and ensuing compliance</p>	<p>IFC PS1</p> <p>EP4 Principle 3</p>	<p>SPV</p>	<p>Throughout Project lifecycle</p>	<p>Permit register maintained.</p>

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	each permit (if available). Applicable permits to be obtained for activities undertaken in the project.	with national permitting requirements	AIIB ESS1			Necessary permits acquired and conditions met.
PS2 – Labour and Working Conditions						
2.1	<p>HR Policy and Labour Management Plan</p> <p>Implement HR Policy and HR-LMP and following procedures that include, but not limited to:</p> <ul style="list-style-type: none"> ▪ Verify age and ensure no one below 18 years old is hired in the Project. ▪ Report any violations against use of child labour and/or forced labour, as serious incident reporting to Lenders and take steps for remediation. ▪ Maintain written contracts with signed copies of Code of Conduct. ▪ Include monitoring indicators on working hours and monitor overtime, overtime payments and ensure working time does not exceed 270 hours annually. ▪ If and when used, screen intermediary agencies, subcontractors and suppliers against child and forced labour risks by: <ul style="list-style-type: none"> ➢ Ensuring that all relevant licences and registrations in place. ➢ Checking media reports and legal cases to ensure no reputational risks, such as human rights violations. ➢ Ensuring that no ID documents of the workers are withheld by anyone or any party. ▪ Monitor targets for local hires and women employment. ▪ Should collective dismissals be anticipated, develop a retrenchment plan at least six months prior. 	Minimise labour management related risks, define labour management procedures for safe and decent working environment.	IFC PS2 EP4 – Principle 4 Turkish Labour Code. AIIB ESS1	SPV, cascaded to EPC and subcontractors	Implementation throughout Project.	Monitoring reports on LMP implementation with evidence and data provided.
2.2	<p>Worker's Grievance Mechanism</p> <ul style="list-style-type: none"> ▪ Implement a worker's grievance mechanism (GM) for all workers, including SPV, EPC and subcontractors and primary suppliers' workers. The worker GM must allow for anonymous submissions and include multiple channels, with grievants free from any reprisal; ▪ Disseminate the GM as part of worker rights during induction training; ▪ Maintain a responsible person for managing the worker grievance log; ▪ Maintain a suitably qualified specialist to manage sensitive grievances; and ▪ Maintain an up-to-date GM tracker. 	Minimise labour management related risks, define labour management procedures for safe and decent working environment.	IFC PS2 EP4 – Principle 6 Turkish Labour Code. AIIB ESS1	SPV	Implementation throughout Project	Evidence of grievance mechanism in place. Grievance records including sensitive grievances, if any recorded. Induction training materials including GM details. Review and audit findings.
2.3	<p>Worker's Accommodation</p> <p>2.3.1 Worker accommodation site audits to be conducted by an independent labour specialist as part of broader Labour Audit (in 2.4.2) to ensure adherence to international standards.</p> <p>2.3.2 Update the camp site management plan with any gap filling measures following the camp site/worker accommodation audit, as needed. Prepare</p>	Management of safe and compliant worker accommodation as well as community health and safety.	IFC PS2 EP4 – Principle 4 Turkish Labour Code IFC/EBRD 2009 guideline on Workers' Accommodation:	SPV to hire third party hired/independent labour auditor, TOR, proposal and CV(s) of auditor acceptable to Lenders	2.3.1 - Hiring of approved, independent labour auditor prior to FC. Initial Findings report - by end Q4 2025 Final Labour Audit – end January 2026	2.3.1 Qualified labour auditor hired, Initial Findings Report, final worker accommodation audit findings within Labour Audit. 2.3.2 Camp site plan updated as required.

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	corrective actions following the audit findings and disseminate to managers at all Contractor and subcontractor camp sites.		Processes and Standards AIIB ESS1		2.3.2 – By first E&S quarterly monitoring, Q1 2026	
2.4	<p>Labour Management and OHS Monitoring</p> <p>2.4.1 - Internal monitoring: Conduct monthly internal monitoring of labour and occupational health and safety (OHS) performance against project commitments, and prepare HR, labour management, and OHS monitoring reports for project management. Reports will also be made available to lenders and the IESC upon request.</p> <p>2.4.2 – External monitoring: Engage an independent third party consultant to conduct a labour audit in line with lender standards, covering a sample of all project contract types, HR-LMP commitments (including EPC and sub-contractors), worker accommodation and occupational health and safety measures to assess compliance with national law and lender standards and to develop time-bound corrective actions for implementation as needed.</p> <p>2.4.3 – External labour audits will continue to be conducted annually unless the initial independent labour audit – or any subsequent labour audits - identify major non-compliances requiring significant corrective actions. In this case, subsequent audits to be completed on a quarterly basis until these issues are resolved.</p>	<p>Improved health and safety performance and safe working environment for workforce (permanent contract/contractor & sub-contractor).</p> <p>Compliance with national legislation and international standards.</p>	<p>IFC PS1 IFC PS2 EP4 – Principle 2 & 4 & 6 National legislation AIIB ESS1</p>	<p>2.4.1 SPV to assign competent team members to carry out monthly monitoring activities.</p> <p>2.4.2 SPV to hire third party independent labour auditor, obtain TOR and CV approval from IESC and lenders</p>	<p>2.4.1 Monthly internal monitoring of HR, Labour management and OHS performance throughout project lifecycle commencing prior to FC.</p> <p>2.4.2 Hiring of approved, independent labour auditor prior to FC. Initial Findings Report - by end Q4 2025 Final Labour Audit – end January 2026.</p> <p>2.4.3 Independent labour audits – annually if no major non-compliances observed, quarterly or as agreed by lenders if major non-compliance/s are observed and until the issue/s are resolved and corrective actions implemented. . Independent labour audits repeated annual (or as agreed with lenders) if no major non-compliances or corrective actions identified throughout project lifecycle.</p>	<p>2.4.1 Monthly internal HR, Labour management and OHS monitoring reports</p> <p>2.4.2 Independent Labour Audit TOR Qualified labour specialist CVs Independent labour auditor contract Initial Findings Report report Final Independent Labour audit report. 2.4.3 Regular Labour Audit reports (annual or quarterly)</p>
2.5	<p>Supply Chain</p> <p>Implement the Supply Chain and Subcontractor Management Plan and the Responsible Sourcing Policy.</p>	<p>Minimise labour risks in supply chain.</p>	<p>IFC PS2 EP4 – Principle 4 Turkish Labour Code AIIB ESS1</p>	<p>SPV</p>	<p>Throughout project cycle</p>	<p>Implementation monitoring and reporting covered in both internal and external labour monitoring reports.</p>
2.6	<p>Health and Safety Plan (Construction Phase)</p> <p>2.6.1 Implement the Health and Safety Management Plan. The Plan should also include the following:</p> <ul style="list-style-type: none"> ▪ Annual Work Plan and Annual Training Plan in accordance with OHS Law (No: 6331); ▪ Establish OHS Committee as per the Regulation on Occupational Health and Safety Committees (Official Gazette No. 28532, dated 18.01.2013); ▪ Job-specific risk assessments and method statements; ▪ Permit to Work System; 	<p>Improved health and safety performance and safe working environment for workforce (permanent contract/contractor & sub-contractor).</p> <p>Compliance with national legislation and international standards.</p>	<p>IFC PS1 IFC PS2 EP4 – Principle 2 & 4 & 6 National legislation AIIB ESS1</p>	<p>EPC</p>	<p>2.6.1 Implementation throughout Project lifecycle</p> <p>2.6.2 Implemented by first E&S monitoring / Q1 2026.</p> <p>2.6.3 HSE audits throughout construction.</p>	<p>2.6.1 Health and Safety Management Plan Annual Work Plan Annual Training Plan. 2.6.2 Risk assessment documentation Evidence of incident / accident classification Near miss reports</p>

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	<ul style="list-style-type: none"> ▪ Accident and Incident Reporting Procedure; and ▪ Communication and reporting requirements for subcontractor. 2.6.2 Implement the following: <ul style="list-style-type: none"> ▪ Site specific risk (area-based hazard identification and risk evaluation) assessment to be carried out during construction; ▪ Establish classification of incidents/accidents for construction and operation; ▪ Improve near miss reporting by raising awareness of employees, making available hard copy near miss forms for construction and operation; and ▪ Establish an incident/accident procedure for construction and operation. 2.6.3 Continue to conduct regular HSE audits throughout construction.					Incident / accident procedure. 2.6.3 HSE audits undertaken.
2.7	Health and Safety Management Plan (Operation Phase) 2.7.1 Develop and implement detailed site specific OHS management plans and procedures for the operation phase of the Project to cover relevant H&S risks. Establish site HSE audit procedure for operation phase. 2.7.2 Continue to conduct regular HSE audits throughout operation	Improved health and safety performance and safe working environment for workforce (permanent contract/contractor & sub-contractor). Compliance with national legislation and international standards.	IFC PS1 IFC PS2 EP4 – Principle 2 & 4 & 6 National legislation AIIB ESS1	O&M Contractor / SPV	At least six months prior to operation start for the operation phase	2.7.1 Operation Phase OHS Management Plan and audit procedure 2.7.2 HSE audit reports
PS3 – Resource Efficiency and Pollution Prevention						
3.1	Quarry Management Plan The Quarry Management Plan should be revised to include measures to utilise the already disturbed areas and minimise disturbance for material extraction.	Compliance with local legislation and IFC PSs.	IFC PS3 AIIB ESS1 EP4 – Principle 4	SPV	Within the first external monitoring period / by end Q1 2026	Updated Quarry Management Plan.
3.2	Air Quality Management Plan The AQMP should be revised to incorporate the pending results of the pre-construction baseline studies and the re-evaluation of the modelling studies to include; <ul style="list-style-type: none"> ▪ Clear definitions of the sensitive locations; and ▪ Monthly measurements should include not only PM₁₀ but also PM_{2.5} measurements at the sensitive locations. 	Compliance with local legislation and IFC PSs.	IFC PS 3 AIIB ESS1 EP4 – Principle 4	SPV	Within the first external monitoring period / by end Q1 2026	Updated Air Quality Management Plan.
3.3	Water and Wastewater Management Plan The WWMP should be continuously monitored throughout construction including maintenance of the WWTP.	Compliance with local legislation and IFC PSs.	IFC PS 3 AIIB ESS1 EP4 – Principle 4	SPV	Ongoing throughout construction	Up to date WWMP including ongoing monitoring and maintenance.
3.4	Noise and Vibration Management Plan The Noise and Vibration Management Plan should be updated after completion of the preconstruction measurements and re-evaluation of modelling results are finished including following items:	Compliance with local legislation and IFC PSs.	IFC PS 3 AIIB ESS1 EP4 – Principle 4 IFC PS 8	SPV	Within the first external monitoring period / by end Q1 2026	Updated Noise and Vibration Management Plan.

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	<ul style="list-style-type: none"> Clear definition of the sensitive location and the monitoring frequencies (monthly); Revision of the vibration monitoring requirement: vibration should be measured during the blasting activities where there are sensitive receptors present in proximity to the blasting site as per the Blasting Management Plan. For cultural heritage receptors, these buffer distances should reflect those specified in the Cultural Heritage Management Plan. Where required, vibration monitoring should be undertaken regularly on the closest receptors and vibration sensitive structures to the blasting areas not quarterly or upon grievances; and Site specific vibration measures. 					
3.5	<p>Emergency Preparedness and Response Plan (construction phase)</p> <p>3.5.1 Update plan through construction phase for each new construction site/ construction camp site and emergency response team -including their respective roles in emergency response team and responsibility locations.</p> <p>3.5.2 Speed dial emergency phone numbers should be updated and disseminated, as all emergency services are now consolidated under 112.</p> <p>3.5.3 Conduct emergency drills / exercises against various scenarios identified in the emergency response plan during construction phase. Involve and coordinate with local emergency response services.</p>	Compliance with local legislation and IFC PSs.	IFC PS 3 AIIB ESS1 EP4 – Principle 4	SPV	Throughout construction phase	3.5.1 Maintained and up to date EPRP. 3.5.3 Records of emergency drills and exercises.
3.6	<p>Resource Consumption</p> <ul style="list-style-type: none"> Identify and monitor KPIs associated with resource consumption, including but not limited to fuel and water consumption and regularly monitor them for operational activities. Keep records of resource consumption amounts such as water, energy and fuel regularly during construction phase. 	Compliance with local legislation and IFC PSs. Efficient use of resources.	IFC PS 3 AIIB ESS1 EP4 – Principle 4	EPC and SPV	Throughout construction and operation	Resource consumption records and reports.
3.7	<p>Implement Waste Management Plan</p> <p>Including:</p> <ul style="list-style-type: none"> Provide training on hazardous waste management Keep waste logs in the temporary hazardous waste storage area regularly and record the entry and exit dates of the wastes on the site during construction phase. 	Compliance with local legislation and IFC PSs.	IFC PS 3 AIIB ESS1 EP4 – Principle 4	SPV	Throughout construction and operation	Training records. Waste logs.
3.8	<p>Topsoil Management</p> <p>Improve topsoil management practices as per geotechnical and ecological considerations in the construction site.</p> <p>Conduct soil quality analysis where there is contamination risk (solvent or fuel storage units) during demolition.</p>	Compliance with local legislation and IFC PSs.	IFC PS 3 AIIB ESS1 EP4 – Principle 4	SPV	Throughout construction and operation	Effective topsoil management observed during E&S monitoring. Soil quality analyses.
PS4 – Community Health, Safety and Security						
4.1	<p>Blasting Management Plan</p> <p>4.1.1 Update the Blasting Management Plan to provide further consideration of community health and safety management including further detail on;</p>	Minimisation of community health and safety risks and impacts.	IFC PS4 AIIB ESS1	EPC	4.1.1 Updated Plan by first monitoring Q1 2026 and prior to any blasting activity.	Implementation monitoring, both included in internal and

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	<ul style="list-style-type: none"> ▪ Notification requirements with the latest information from the assessment of vibration, fly rock and air shock impacts and the settlements identified. ▪ Measures and timelines on undertaking sensitivity and structural building assessments of nearby settlements/buildings within the 100 meters of the motorway alignment before and after blasting activities. ▪ Corrective action planning in case of claims on damage to structures to be assessed through independent expert and agreed with the complainant (i.e., restoration or compensation etc.). ▪ Measures on developing evacuation plans for structures/buildings/houses that need to be vacated due to potential blasting/vibration impact. <p>4.1.2 Implement the Blasting Management Plan. Notify local gendarmerie and nearby communities, including the settlements identified for vibration, fly rock and air shock impacts, 15 days before blasting where possible, and otherwise at least a week prior as well as immediately prior to blasting. Notifications should explain procedures and safety measures undertaken.</p>		EP4 – Principle 4		4.1.2 Implementation throughout construction.	external E&S monitoring.
4.2	<p>Demolition Management Plan Implement the Demolition Management Plan including demolition procedure for each type of structure; monitor implementation of the mitigation measures and asbestos measures.</p>	Minimisation of occupational and community health and safety risks and impacts.	IFC PS4 AIIB ESS1 EP4 – Principle 4	SPV and EPC	Prior to any demolition activity.	Implementation monitoring, both included in internal and external E&S monitoring.
4.3	<p>Emergency Preparedness and Response (Construction phase) 4.3.1 Implement the EPRP, conduct drill scenarios as per the management plan and notify communities in advance when drills take place. Review evacuation routes and designated meeting points, update as needed. 4.3.2 In case of any real emergency, inform lenders as per the CTA on incidence response and actions undertaken.</p>	Minimisation of occupational and community health and safety risks and impacts.	IFC PS4 AIIB ESS1 EP4 – Principle 4	SPV and EPC	4.3.1 Throughout construction. 4.3.2 Based on the CTA conditions, throughout construction.	4.3.1 Implementation monitoring, both included in internal and external E&S monitoring. 4.3.2 Incident reports furnished to Lenders.
4.4	<p>Emergency Preparedness and Response (Operation phase) An operation phase EPRP should be developed and include:</p> <ul style="list-style-type: none"> ▪ Potential incident scenarios and procedures for response; ▪ Details of emergency equipment, such as fire extinguishers, smoke detectors, and first-aid kits, etc. should be inspected periodically and be replaced if expired throughout the construction and the operation phases; ▪ Details of evacuation routes and designated meeting points; ▪ Details of the emergency response team; and ▪ Allocation of sufficient resources for emergency response and first-aid. 	Improved health and safety performance and safe working environment for workforce (permanent & contract/contractor & sub-contractor). Compliance with national legislation.	IFC PS1 & PS4 AIIB ESS1 EP4 – Principle 4	O&M contractor / SPV	At least six months prior to operation commencing	Emergency Preparedness and Response Plan – Operation.
4.5	<p>Gender Action Plan 4.5.1 Develop a Gender Action Plan that includes site-specific actions to prevent GBVH risks and improve women’s employability across the different Project components and specifies monitoring and performance indicators. 4.5.2 Implement and review regularly, incorporating stakeholder feedback to support continuous improvement.</p>	Manage gender related risks and impacts and promote opportunities for gender equality.	Best practice	SPV	4.5.1 Prior to FC 4.5.2 Throughout Project lifecycle	Gender Action Plan developed, implemented and updated.

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4.6	<p>Traffic and Road Safety Management</p> <p>4.6.1 Implement the Traffic Management Plan to ensure specific road safety measures for villages are implemented and duly monitored. Such measures should include, but not limited to:</p> <ul style="list-style-type: none"> ▪ Soft interventions, such as but not limited to, awareness campaigns, training sessions for drivers and road users, schools, and community engagement activities to promote safe behaviour; and ▪ Hard interventions such as installation of appropriate signage, road barriers, lighting, and traffic control measures and safety shelters. <p>4.6.2 Develop and implement the Traffic and Road Safety Management Plan for operation phase.</p>	Promote community health and safety.	IFC PS 4 Best practice AIIB ESS1 EP4 – Principle 4	SPV	4.6.1 Throughout construction. 4.6.2 Three months prior to commencement of operation and implemented throughout operation	Traffic and Road Safety Management Plan developed, updated and implemented throughout.
4.7	<p>Security Management Plan</p> <p>Implement the Security Management Plan in line with the Voluntary Principles on Security and Human rights in line with lender requirements, maintaining training records of security personnel and signed copies of the Code of Conduct.</p>	Minimisation of community health and safety and gender risks.	IFC PS4 International best practice on Voluntary Principles on Security and Human Rights AIIB ESS1 EP4 – Principle 4	EPC (reviewed and approved by SPV)	Background checks and vetting prior to onboarding security provider. Security management plan to be implemented throughout construction.	Implementation monitoring included in internal and external E&S monitoring reports. Evidence of signed CoC by security personnel and training records.
PS5 – Land Acquisition and Involuntary Resettlement						
5.1	<p>RAP Execution and Coordination</p> <p>Ensure final version of RAP is shared with KGM and formally endorsed. Maintain, implement and monitor the RAP with the RAP implementation team in coordination with KGM. Ensure RAP execution includes:</p> <ul style="list-style-type: none"> ▪ Completion of land acquisition and timely compensation by KGM and SPV in accordance with the RAP and RAP Fund procedures; ▪ Holding regular bi-weekly coordination meetings between KGM, SPV and EPC, internal RAP audits reported monthly and the External RAP consultant to monitor land acquisition and support measures quarterly; ▪ Updating land, asset, and crop valuations at least annually to reflect market rates and ensure payment of full replacement cost; ▪ Confirming secured budgets with KGM for their own operations and disbursement schedules for compensation payments and RAP measures, with contingency planning for high-cost segments; ▪ Preparing detailed business-specific livelihood restoration plans; ▪ Preparing a detailed parcel-level Cumulative Impact Assessment; ▪ Developing a livelihood restoration plan that incorporates household-specific cumulative impact mitigation measures; ▪ Conducting a structured assessment of vulnerable employees in affected businesses, including those in informal or casual arrangements, and establish support plans accordingly; and ▪ Completing an income-based valuation for orchards and high-value crops and its application. 	Management of land acquisition and resettlement risks through a formalised documents and system.	IFC PS5 EP4 – Principle 3, 4 AIIB ESS2	SPV	Continuous until RAP Completion Audit	Approved RAP and RAP budget by lenders. RAP endorsement by KGM. RAP Implementation Procedure. Internal and external RAP monitoring reports. Payment /RAP Fund disbursement records. Meeting minutes with KGM. Updated valuation Study (each year).

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5.2	<p>RAP Implementation Procedure</p> <p>Develop a RAP Implementation Procedure that includes the following (at a minimum):</p> <ul style="list-style-type: none"> ▪ Details criteria for utilisation of RAP Fund and sets responsibilities; ▪ Formalises inter-agency coordination and operationalise RAP Fund disbursement processes with clear roles and responsibilities; ▪ Defines, and operationalises tools and documents such as PAP database, vulnerability scoring tools, and develop a cumulative impact register for coordination; and ▪ Monitors and integrates overlapping project impacts in the RAP database. 	Management of land acquisition and resettlement risks through a formalised documents and system.	IFC PS5 EP4 – Principle 4, 5 AIIB ESS2	SPV with the support of RAP Consultant	Prior to FC	RAP Implementation Procedure.
5.3	<p>RAP implementation team</p> <p>Maintain the RAP implementation team under the SPV and complete recruitment of the outstanding positions required for effective RAP implementation, including:</p> <ul style="list-style-type: none"> ▪ CLOs (x3) ▪ Agricultural Expert ▪ Survey Engineer ▪ Property Valuation Expert(s) including for businesses 	Improved social performance through strengthened internal capacity.	IFC PS5 EP4 – Principle 4 AIIB ESS2	SPV	Listed roles by the end of January 2026	<p>Evidence of appointment of implementation team.</p> <p>Recruitment in accordance with the detailed roles and responsibilities outlined in the RAP.</p> <p>Updated organogram with indication of members of RAP implementation team.</p> <p>Training records.</p>
5.4	<p>Land Entry Conditions</p> <p>Ensure that land access and construction shall only proceed when:</p> <ul style="list-style-type: none"> ▪ All required permits (including forestry and other public land use permits) are secured and verified through an internal audit mechanism; ▪ Legal expropriation is finalised (Article 8 or Article 27, as applicable); and ▪ In exceptional cases where the above cannot be finalised but urgent construction must proceed, written consent from landowners and users is obtained, ensuring their rights under national law and full RAP entitlements are preserved. 	Prevention / minimisation of land acquisition impacts.	IFC PS5 EP4 – Principle 4, 5 GIIP AIIB ESS2	EPC and SPV responsible for monitoring and restriction enforcement; validated by RAP Consultant and IESC	Immediate and continuous. Reviewed (jointly by SPV and EPC) prior to access of each parcel.	<p>Land entry protocols.</p> <p>Land access readiness checks.</p> <p>Written consents/protocols.</p> <p>Regular RAP implementation monitoring reports (internal and external).</p> <p>IESC monitoring reports.</p>
5.5	<p>Land access monitoring</p> <p>Establish and implement a land access monitoring and control mechanism to ensure compliance with displacement minimisation commitments.</p>	Effective management and monitoring of displacement minimisation.	IFC PS5 EP4 – Principle 4 GIIP AIIB ESS2	SPV social and expropriation teams to develop a land access tracking register with support from the EPC contractor and CLOs.	Prior to FC	<p>Land entry protocols.</p> <p>Evidence of compensation payments.</p> <p>Consent letters.</p> <p>Incident records indicating early land access.</p>

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						Internal RAP implementation monitoring reports.
5.6	<p>Priority Expropriation of Consent-Accessed Lands</p> <p>Ensure that all lands previously accessed through written consent prior to September 2025 are prioritised for expropriation and that a list of such lands is provided to KGM to enable immediate action.</p> <p>For any lands accessed through written consent after September 2025 are prioritised and expropriated within four months of obtaining consent.</p>	Prevention / minimisation of land acquisition impacts.	IFC PS5 EP4 – Principle 4 GIIP AIIB ESS2	SPV Expropriation Manager to prepare a list and communicate with KGM to enable prioritisation of expropriation.	By end of 2025 for lands entered prior to September 2025. Within four (4) months of obtaining written consent for lands entered after September 2025.	Title deed transfers. Expropriation records. Evidence of compensation payments.
5.7	<p>Expropriation corridor</p> <p>Finalise and disclose the updated expropriation corridor for the road alignment in impacted settlements via sharing lists of parcels impacted, printed maps showing expropriation corridor and information on applicable expropriation corridor width for each settlement.</p> <p>Ensure similar approach adopted for the expropriation corridor for the associated facility footprints (if any).</p>	Effective management of community expectations through a formalised system.	IFC PS1 and PS5 EP4 - Principle 4 GIIP AIIB ESP AIIB ESS1 AIIB ESS2	SPV to lead. RAP implementation team, expropriation manager and GIS team to prepare updated footprint maps and tables.	Prior to FC. Associated facility footprints within one month upon final selection decision by the SPV and EPC and upon completion of permitting requirements for each facility.	Final map and table of land acquisition corridor and impacted parcels. Evidence of disclosure.
5.8	<p>Coordination of Expropriation, RAP/LRP Implementation and Construction Schedules</p> <p>Ensure that the EPC construction priorities, RAP/LRP implementation, and KGM expropriation timelines are aligned, with all parties coordinating in advance to secure timely land access.</p>	Management of land acquisition and resettlement risks through a formalised documents and system.	IFC PS5 EP4 - Principle 4 AIIB ESS2	SPV in coordination with KGM and EPC	Continuous until RAP Completion Audit	KGM's Expropriation schedule. EPC's Construction schedule. SPV's RAP implementation and LRP schedule. KGM land acquisition records. Regular RAP implementation monitoring reports (internal and external). Land Entry Protocols.
5.9	<p>Land Access Summary Table</p> <p>Prepare a table listing all public and private lands entered from November 2024 to September 2025 indicating date and purpose of entry, land use status, formal and informal users, expropriation status, consent and permit availability at the time of entry, works carried out etc.</p>	Management of land acquisition and resettlement risks and non-compliance with national law and lender requirements.	IFC PS5 EP4 - Principle 4 AIIB ESS2	SPV with the support of RAP Consultant	Prior to FC.	Land Access Summary Table. Permits. Consents. Photos.
5.10	<p>Guide to Land Acquisition and Compensation (GLAC)</p> <p>Shorten the three existing GLACs into more reader friendly formats, considering updates in the final RAP.</p> <p>Ensure the GLAC is effectively disseminated to impacted communities and businesses, supported by additional engagement meetings to reinforce understanding of project supports and benefits.</p>	Increased awareness on Project benefits through diversified engagement tools.	IFC PS1 and PS5 EP4 - Principle 4, 5, 6 AIIB ESS1 AIIB ESS2	SPV to prepare and SPV/EPC to disseminate via support of project CLOs	Update of the three (3) GLACs prior to FC. Dissemination of GLAC continuous until land acquisition is complete.	Entitlement based GLACs. Availability of GLACs on project website. Log of supportive meetings carried out to inform impacted groups.

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					Additional meetings held at each impacted settlement by end of January 2026.	
5.11	<p>Livelihood Restoration Plan</p> <p>Further detail and implement the Livelihood Restoration Plan (LRP) based on the framework provided in the RAP. Ensure the livelihood restoration measures include:</p> <ul style="list-style-type: none"> ▪ Strengthened mechanisms to identify and compensate informal actors and vulnerable groups; ▪ Inclusive, accessible training and outreach models also considering vulnerable groups; ▪ Diversified and validated livelihood options; ▪ A robust monitoring and evaluation (M&E) framework; ▪ Accelerated processes for relevant consultants to be commissioned and deployed; and ▪ Improved recognition and support for informal workers. 	Prevention / minimisation of livelihood impacts.	IFC PS5 EP4 - Principle 4, 5, 6 AIIB ESS2	SPV and RAP Consultant, with support from external specialist where necessary	LRP Consultant to be commissioned prior to FC. LRP packages to be completed by end of Q1 2026.	Approved project specific LRP packages. Records and reporting of LRP implementation. Grievance logs. Regular RAP implementation monitoring reports (internal and external). IESC monitoring reports. RAP Completion Audit.
5.12	<p>RAP Monitoring</p> <p>Implement RAP Monitoring Framework as detailed in the RAP, including indicators for physical and economic displacement outcomes, to be reviewed through periodic internal and third-party audits.</p> <p>The RAP Monitoring Framework is to be carried out at three levels: (i) internal monitoring by the SPV RAP Implementation Team, supported by third-party consultants; (ii) external monitoring by the IESC and independent experts to assess compliance with IFC PS5; and (iii) a RAP Completion Audit by independent resettlement specialists to confirm whether livelihood restoration and other RAP objectives have been achieved.</p>	Enhanced decision making through formalised monitoring tools.	IFC PS5 EP4 – Principle 9, 10 AIIB ESS2	SPV and RAP Consultant to develop framework	Internal monthly RAP monitoring by SPV commencing prior to FC. Commissioning of the External RAP monitoring consultant to take place prior to FC. First quarterly RAP external monitoring to take place January 2026. All of the above continued until issuance of RAP Completion Audit.	RAP Monitoring Framework. Regular RAP implementation monitoring reports (internal and external). RAP Completion Audit.
5.13	<p>RAP Budget Management</p> <p>5.13.1 Periodically review and (if necessary) update the RAP Budget to ensure sufficient resources for anticipated costs.</p>	Management of risks through sufficient budget allocation.	IFC PS5 EP4 – Principle 4, 10 AIIB ESS2	SPV	Quarterly starting October 2025 until RAP Completion Audit.	RAP Budget Update.
	5.13.2 Undertake parcel-level studies to identify cumulative impacts and update the RAP budget to include associated costs. If contingency allocations are insufficient ensure the RAP budget is increased to cover these additional costs.			SPV and consultants involved in Cumulative Impact studies.	Budget to be adjusted to include cumulative impacts by October 2026.	RAP Budget Update Results of Additional Cumulative Impact studies.
5.14	<p>Eviction</p> <p>In the case that a PAP or business refuses to vacate expropriated land, provide the Lenders and IESC with an information note prior to KGM initiating legal eviction and once all RAP measures have been exhausted. The note should justify eviction</p>	Management of reputational risks and expectations on forced eviction	IFC PS5 EP4 – Principle 4, 10 AIIB ESS2	SPV and EPC Expropriation Team	Information notes to be prepared at least 15 days' advance of KGM taking legal action for each eviction case.	Grievance log Information note Regular RAP implementation

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	by detailing completed RAP engagements and commitments, case background and a timeline of actions and execution dates.					monitoring reports (internal and external)
PS6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources						
6.1	<p>Biodiversity Management Plan (BMP)</p> <p>6.1.1. The biodiversity figures should be updated to increase clarity round the location of sensitive biodiversity identified, i.e., split into several figures at a larger scale. These should be provided within the ESIA and cross-referenced elsewhere, as required.</p> <p>6.1.2. The engagement with a third-party contractor for Pyrus translocation and identification of suitable translocation sites should be a specific aim (rather than a footnote). Identification of suitable receptor site(s) is a key component and should be done early in the BMP implementation.</p> <p>6.1.3. Wherever there is a pre-construction survey action, this should be accompanied by a description of what will be done if surveys reveal sensitive biodiversity. This is currently missing within IX.2 in places and should be added to sections where it is missing. I.e., micro-siting of works, temporary suspension of activities, translocation of sensitive biodiversity (although this is a last resort and will require additional detail to describe how this will be done, by who, and to which receptor sites).</p>	<p>Reputational risks associated with biodiversity.</p> <p>Non-compliance with Lender standards and GIIP.</p>	<p>IFC PS6</p> <p>EP4 – Principle 4</p> <p>AIIB ESS1</p>	SPV	<p>6.1.1 Prior to FC</p> <p>6.1.2 Prior to translocation</p> <p>6.1.3 As part of quarterly E&S monitoring</p>	BMP produced to approval of Lenders.
6.2	<p>Biodiversity Management Plan (BMP)</p> <p>All pre-construction surveys (both flora and fauna) required of the BMP should be undertaken by a suitably experienced biodiversity specialists and adopting appropriate methods for the species/group being surveyed. Findings from these surveys should inform the requirement for corrective actions as per the BMP and BAP. Relevant findings should also be included within BAP updates, as required.</p> <p>The survey findings and subsequent corrective actions should be reported within quarterly E&S reporting in line with ongoing construction monitoring on the Project.</p> <p>2.</p> <p>3. Collision impact mitigation should be expanded upon to describe how collisions will be monitored, and how the Project will enforce a speed limit change in response to excessive collisions. It should be confirmed whether the corrective action been agreed with the relevant authorities. Signage as a measure should also be considered.</p>	<p>Reputational risks associated with biodiversity.</p> <p>Non-compliance with Lender standards and GIIP.</p>	<p>IFC PS6</p> <p>EP4 – Principle 4</p> <p>AIIB ESS1</p>	SPV	Throughout construction; to be reported quarterly	BMP produced to approval of Lenders.
6.3	<p>Biodiversity Action Plan</p> <p>An example protocol should be shared to provide evidence of previous relevant engagement with the Ministry of Forestry.</p>	<p>Reputational risks associated with biodiversity.</p> <p>Non-compliance with Lender standards and GIIP.</p>	<p>IFC PS6</p> <p>EP4 – Principle 4</p> <p>AIIB ESS1</p>	SPV	Prior to FC	BAP produced to approval of Lenders.
6.4	<p>Biodiversity Action Plan (BAP)</p> <p>A replanting Protocol should be signed with the Ministry of Forestry that meets (or exceeds) the requirements of the BAP. Relevant details from this Protocol should be included within BAP updates, as required.</p>	<p>Reputational risks associated with biodiversity.</p> <p>Non-compliance with Lender standards and GIIP.</p>	<p>IFC PS6</p> <p>EP4 – Principle 10</p> <p>AIIB ESS6</p>		Within monitoring period, prior to Q2 2026	BAP updated to approval of Lenders.

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6.5	<p>Biodiversity Action Plan</p> <p>A map of the various offsite/offsetting areas should be provided once available from Ministry of Forestry to ensure appropriateness with regards objectives of the BAP. This should be included within updates to the BAP.</p> <p>A Biodiversity Monitoring and Evaluation Plan (BMEP) should be produced, which should include explicit reference to these offset sites/areas also.</p>	<p>Reputational risks associated with biodiversity.</p> <p>Non-compliance with Lender standards and GIIP.</p>	<p>IFC PS6</p> <p>EP4 – Principle 4</p> <p>AIIB ESS1</p>	<p>SPV</p>	<p>Within monitoring period, prior to Q2 2026</p>	<p>BAP produced to approval of Lenders.</p>
PS7 – Indigenous Peoples – NOT APPLICABLE						
PS8 – Cultural Heritage						
8.1	<p>Cultural Heritage Management Plan</p> <p>Update the Cultural Heritage Management Plan to include:</p> <ul style="list-style-type: none"> ▪ Commitments for site-specific mitigation and monitoring for anticipated air shock and fly rock impacts (additional to vibration effects); ▪ Ensure cultural heritage noise, vibration (and blasting) mitigation and monitoring commitments are reflected in the N&V Management Plan and the Blasting Management Plan. ; ▪ Clarifying statement within the Cultural Heritage Management Plan that all nationally designated / Registered resources will require permits (and applicable conditions) prior to construction commencing; ▪ An updated / implementable Grave Relocation Plan to include a role for the Cemetery Guardian / religious leader, and clarity on the locations where cemetery relocation is required as mitigation (e.g., as listed in Table II in the ESIA). The associated processes (and timeframe) to identify suitable ‘new’ cemetery sites should be outlined. This should be referred to as a pre-construction Project commitment (with reference to the applicable HRM site number and the appended Constraints Maps). ▪ Cross reference to the Project SEP to show alignment in commitments for ongoing stakeholder engagement (with both PAP and ARHB); and ▪ Updates to Table 10, to correct errors / general explanations as per ESIA Chapter updates (described in Item 1.3). 	<p>Reputational risks associated with cultural heritage loss.</p> <p>Non-compliance with national Law, Lender standards.</p>	<p>IFC PS 8</p> <p>AIIB ESS1</p>	<p>SPV, supported by Project Cultural Heritage Team</p>	<p>Prior to FC</p>	<p>Updated, implementable, CHMP that meets Lender standards.</p> <p>All permits obtained.</p> <p>Permit conditions (where applicable) updated in the CHMP “live’ tracker.</p>
8.3	<p>Chance Find Procedure</p> <p>Minor updates the Project Chance Find Procedure to improve effectiveness / alignment with PS-8:</p> <p>Add “site-based contractor” as a separate row and role under “Roles & Responsibilities” Table 1, rather than combined with the Project Archaeologist role, to state that “all site-based contractors have the authority to stop works is they suspect an archaeological chance find, and report to the Project Archaeologist”.</p>	<p>Reputational risks associated with cultural heritage loss.</p> <p>Non-compliance with national heritage Law, Lender standards.</p>	<p>IFC PS 8</p> <p>AIIB ESS1</p>	<p>SPV, supported by Project Cultural Heritage Team and EPC.</p>	<p>Prior to Construction / Q1 2026</p>	<p>Updated, implementable, CFP that meets Lender standards.</p>