



ESMS MANUAL

KAIROUAN SOLAR PROJECT

RESPONSIBILITIES

PHASE	DATE	NAME	FUNCTION
Elaboration	25-07-2022	Ibrahim Masri	Eco Consult – E&S Consultant
Validation	27-07-2022	Donia Mejiri	KSP – Social Specialist
Approval	27-07-2022	Vito Saluto	AMEA Power – Head of ESG

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ABBREVIATION AND ACRONYMS

CLO	Community Liason Officer
CSR	Corporate Social Responsibility
EHS	Environment, Health and Safety
EHSS	Environment, Health, Safety and Social
EPC	Engineering, Procurement and Construction
ESIA	Environmental and Social Impact Assessment
ESG	Environmental Social Governance
ESMS	Environmental and Social Management System
HR	Human Resources
HSE	Health, Safety and Environment
HSSE	Health, Safety, Social and Environment
IFC	International Finance Corpoation
IFI	International Financing Institution
KPI	Key Performance Indicator
KSP	Kairouan Solar Project
kWh	Kilo-Watt Hour
MV	Medium Voltage
MW	Mega Watt
O&M	Operation and Maintance
OE	Owner's Engineer
OHS	Occupational Health and Safety

OHTL	Overhead Transmission Line
PS	(IFC) Performance Standard
SEP	Stakeholder Engagement Plan
STEG	Tunisian Company of Electricity and Gas
TBT	Tool Box Talk
WB	World Bank

1 INTRODUCTION

1.1 Background

Tunisia has adopted in 2014 the “Energy Transition Policy” which aims for a 30% reduction of its primary energy consumption by 2030 and a 30% contribution of renewable energy in electricity production by the same period. To achieve these objectives, Tunisia has adopted a number of measures, including the following:

- Creation of the Energy Transition Fund in 2014; and
- Promulgation of the law on electricity production from renewable energies in 2015.

The Tunisian Solar Program (TSP) is the operational program to achieve the objective of the Energy Transition Policy in terms of introducing Renewable Energy in Tunisia. The TSP aims at increasing electricity production of renewable energies from 3% in 2016 to 30% in 2030, with an intermediate target of 12% in 2020. This includes 10% from solar energy; including 7% PV and 3% Concentrated Solar Thermal (CSP).

Under the TSP, the Government of Tunisia represented by its Ministry of Industry, Mining and Energy, launched an international competitive bidding process for selection of companies for the development of solar PV Projects.

As part of the competitive bidding process, the consortium AMEA Power-TEBA (hereafter referred to as “the Sponsor”), was awarded in December 2019, an Agreement for the development of a 100 Mega Watt (MW) Photo Voltaic (PV) Solar power plant in the governorate of Kairouan, Tunisia (hereafter referred to as “the Project”).

The Sponsor will be seeking financing for the Project from prospective lenders, including International Financial Institutions (IFIs) – this will include the International Finance Institution (IFC) and the African Development Bank (AfDB). Therefore, the Sponsor wishes to design and manage the project in accordance with good international industry practice, including Environmental and Social (E&S) requirements – this will include the IFC Performance Standards (PS) on Environmental and Social Sustainability (2012) as well as AfDB’s Operational Safeguards (OS). IFIs require disclosure of such E&S requirements as provided in further details in “Section o”.

As part of such IFI E&S requirements, an Environment and Social Management System (ESMS) Manual must be developed to be implemented for the construction and operation phase. In general, the objective of the ESMS Manual is to determine the overall structure and outline of the ESMS and provide details on some key components aimed at managing key impact, to be implemented for the Project during both the construction and operation phase, until the end of the Power Purchase Agreement (PPA) term.

1.2 Project Location

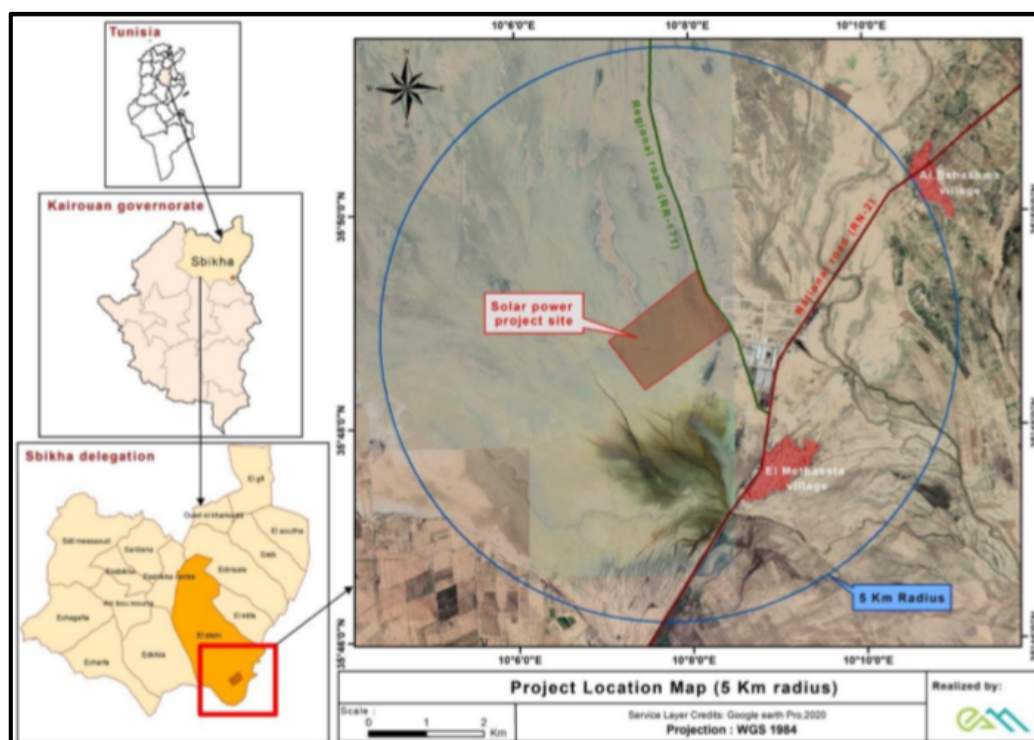


Figure 1: Project Site and closest villages

1.3 Project Components

The table below provides a summary of Project components that are discussed below in detail.

COMPONENT	DESCRIPTION
Project Generation Capacity (MW)	100
Technology type	Solar PV
PV Cell type	Monocrystalline, Bifacial
Infrastructure and Utilities	Underground cables, central inverter stations, substation, warehouse and office, water reservoir.

The key components of the Project are discussed below.

PV Power Arrays: The Project will be divided into respective blocks, where each block will be composed of PV Power arrays. Each array consists of the following components:

- PV panels: each array is made of PV panels. The exact specifications for the PV Panels for this project are not yet known but will be of Bi-facial Monocrystalline solar module technology which utilizes silicon as a semiconductor material for generation of electricity. Silicon is considered a non-hazardous material;
- Each array is equipped with a single-axis beam tracker which carries the array and orients it towards the sun throughout the day to maximize the amount of energy produced.

Infrastructure and Utilities

- PV modules will be connected to a central inverter station through underground cables. The inverter station converts the electricity produced from the panels from Direct Current (DC) to Alternating Current (AC).
- Each of the central inverter stations will then connect through underground cables to a substation onsite. The substation converts the voltage to an appropriate level for connection with the national grid.
- Building Infrastructure will mostly include offices for normal daily operational related work, as well as a warehouse for storage of equipment and machinery.
- Road network that will include: (i) an internal road network for ease of access to the arrays for operation and maintenance purposes; (ii) security road around the perimeter of the Project site for security patrolling; and (iii) access road from the highway to the site.
- Fencing around the entire facility and security will be required to ensure safety from criminal activity and trespassing of unauthorized personnel.
- Monitoring System: Provides information of the plant equipment performance for operation and maintenance.
- On-site water reservoirs are most likely to be used for the water requirements of the Project. Water will be used mainly for potable purposes as well as for the occasional cleaning of the panels to prevent dust build-up as this would affect their performance. It will be ensured that water supply for the Project will not impact water supply and existing resources in the area.

Associated Facilities

- It is important to note that the Project also includes an electricity transmission line. The electricity generated from the Project will be connected from the substation (discussed above) to the National Grid through an Overhead Transmission Line (OHTL) that will be developed by Tunisian Company of Electricity and Gas (STEG). A standalone Environmental and Social Impact Assessment (ESIA) has been undertaken for the OHTL.

1.4 Project Phases and Schedule

The key phases anticipated for the construction and operation phase of the Project are summarized below.

Construction Phase

- Phase 1: Engineering and Documentation: This involves obtaining the permits required for the project and undertaking studies for development (e.g. geotechnical, topography, etc.) as well as preparing the detailed design for all project components.
- Phase 2: Procurement and Delivery of Materials: This involves the procurement of all materials required for the project development to include those required for civil works (fence, water tanks, etc.), mechanical works (PV modules, mounting structures, tracker structures, etc.) and electrical works (cables, conduits, etc.). In addition, this will also involve the transportation and delivery of such components onsite.
- Phase 3: Assigning of Subcontractors: This includes tendering and selection of all subcontractors for the Project to include civil, electrical and mechanical contractors.
- Phase 4: Mobilization and Early Works: This includes undertaking all mobilization and early works to include fence installation, installation of site offices, preparation of laydown area, preparation of site storage and workshop area and other as appropriate.
- Phase 5: Construction of PV Blocks: As discussed earlier, the Project site will be divided into blocks. Under this phase, this will involve all civil works (grading, foundations, drainage, etc.), mechanical works (mounting structure installation, PV modules installation, etc.), and electrical works (underground works, DC works, Low Voltage works, earthing and lightning protection, etc.) under each block.
- Phase 6: Construction of Substation: This includes the civil and electrical works for construction of the substation located onsite and which will include civil works (grading, foundations, drainage, etc.) and electrical works (AC works, Medium Voltage works, etc.).
- Phase 7: Construction of Control Building and Warehouse: This includes the civil works, mechanical, and electrical works for construction of the control building and warehouse.
- Phase 8: Construction of Road Networks: This includes the civil works for construction of all required internal road networks.
- Phase 9: Testing and Commissioning: Commissioning tests involve standard electrical tests for the electrical infrastructure as well as the panels, and inspection of routine civil engineering quality records. Careful testing at this stage is vital if a good quality PV farm is to be delivered and maintained.

Operation Phase

This includes the normal daily operation of the PV farm including its maintenance to optimize the energy yield and the life of the system. Maintenance can be divided into the preventive and corrective maintenance. The preventive maintenance follows a routine service schedule aimed at preventing faults from occurring and keeping the plant operating at its optimum level. The frequency of the preventive maintenance depends on a number of factors such as the technology selected, environmental conditions of the site, warranty terms and seasonal variances. It contains for example activities like PV module cleaning, inverter servicing or checks on structural integrity of the mounting structure. The corrective maintenance is carried out in response to failures for example the repair/ exchange of damaged equipment or inverter faults.

It is important to note that the PV modules will be cleaned on a regular basis to prevent dust build-up which could affect their performance. Priority will be for the use of dry cleaning of the panels which does not entail the use of water. This involves the use of dry mobile cleaning equipment. However, it is expected that there would still be situations where water will be required to clean the panels (e.g. when dust becomes adhesive from rain or humidity).

1.5 Involved Entities

Different entities are involved in the construction and operation phase of the project. Responsibilities of each entity are listed in the text below along with a general description of their roles.

- Kairouan Solar Project Co. (KSP): The owner and Project Company of the Project (hereafter referred to as 'AMEA Power (the Sponsor): is the Project proponent and Sponsor and will be the owner of the Project.
- Owner's Engineer (OE): the OE will be appointed by the Sponsor and will be involved throughout the construction phase to ensure that the EPC Contractor is adhering to the technical project specifications required.
- Engineering, Procurement, and Construction (EPC) Contractor: responsible for the development of the Project on a turnkey basis. Responsibilities include the preparation of the detailed design of the Project, supply of the material and equipment (panels, cables, transformers etc.), and construction of the Project and its various components (panels, internal access roads, building infrastructure, connections, etc.). The EPC Contractor for this Project has not been assigned yet;
- Subcontractors: this will involve subcontractors during the construction phase for civil, electrical and mechanical works. Subcontractors have not been selected at this stage.
- O&M Contractor: responsible for Operation and Maintenance (O&M) of the Project to include normal daily operation as well as undertaking preventive and corrective maintenance activities. The O&M Contractor has not been assigned yet.

2 ROLES AND RESPONSIBILITIES

This section identifies the EHSS (Environmental, Health, Safety and Social) roles and responsibilities for key personnel involved in the Project during construction and operation. These roles must be included in the job descriptions and be known by the concerned employees. Throughout the Project, project management and employees, all contractors/lower-tier contractors will comply with this plan as relevant.

2.1 Construction Phase

The figure below presents the organizational structure for the construction phase. Based on the organization structure, this section identifies the lines of authority and roles and responsibilities for those personnel that are involved in the EHSS management during construction.

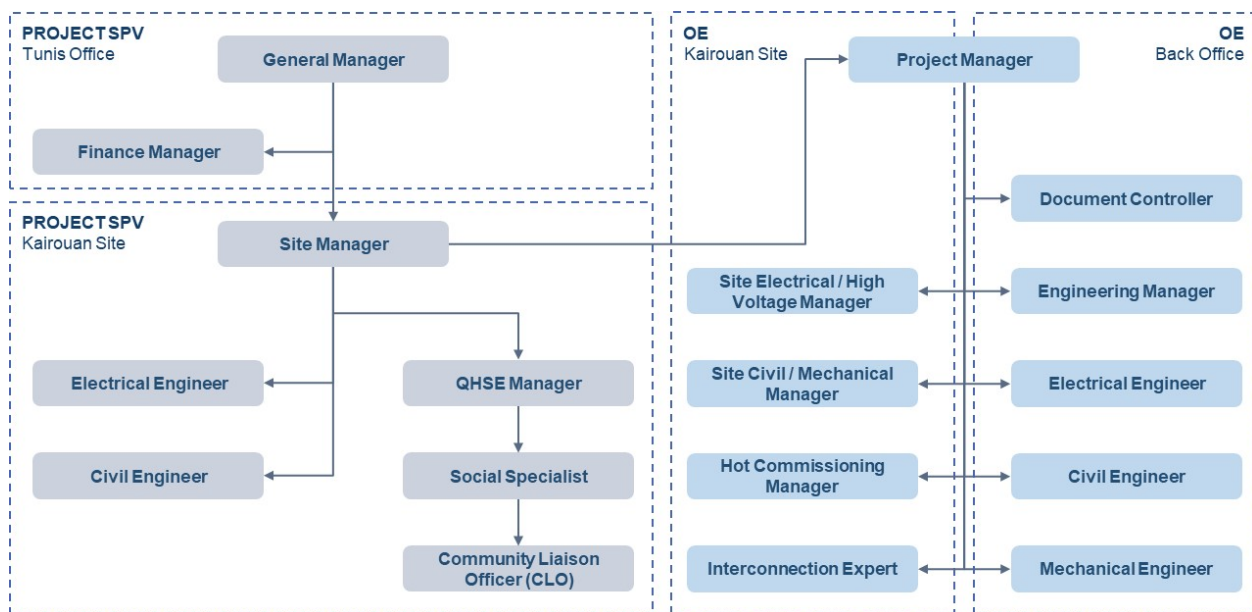


Figure 2: KSP Organizational Structure for Construction Phase

Please note that the above organisational chart outlines the core structure for the implementation of the ESMS, but each plan will include specific responsibilities, differentiating where relevant between contractors (e.g. security contractor, logistics contractor) and suppliers (key supply chain, local suppliers, etc.).

Please also note that this organizational structure is not exhaustive of all the HSE, Social and Security roles provided by the EPC Contractor.

Project Manager – Sponsor

- Overall monitoring of EHSS performance of the Project and defines feasible and sustainable actions to enhance it
- Ensures the availability of required resources to properly implement the EHSS plans and requirements
- Promotes leadership in EHSS and implement EHSS improvement initiatives

- Provides the means to control the EHSS risks on all activities of the Projects
- Enhances the EHSS compliance culture through exemplarity and commitment
- Chairs monthly EHSS Committee meetings (as detailed further in Section 7.1)
- Guarantees that all employees under his/her authority and responsibility are medically fit, trained, accredited, equipped and competent to perform their work
- Ensures the consistent enforcement and implementation of all programs, policies and procedures
- Ensures that EPC Contractor and subcontractors meet EHSS requirements of the Project

Head of ESG – Sponsor

- Monitoring of EHSS performance of the Project and defines feasible and sustainable actions to enhance it
- Ensures the availability of required resources to properly implement the EHSS plans and requirements
- Ensures the consistent enforcement and implementation of all programs, policies and procedures
- Maintains and updates EHSS rules, regulations and guidelines, local/international requirements as applicable to the project
- Develop, maintain and monitor EHSS plans (as identified in Section 3.3)
- Review and approve EPC Contractors' and subcontractors' EHSS plans as required
- Plans, organizes, participates and conducts HSE audits (as detailed in Chapter 8)

QHSE Manager – Project Company

- Supports Project Manager in steering and implementing the EHS management of Project
- Focal Point for all Health, Safety, and Environmental (HSE)
- Supporting in maintains and updates EHS rules, regulations and guidelines, local/international requirements as applicable to the project
- Advises on legislative changes concerning EHS which may affect the Project
- Support in developing, maintaining and monitoring EHS plans (as identified in Section 3.3)
- Assist in reviewing EPC Contractors' and subcontractors' EHS plans as required
- Ensures the implementation and verification of corrective and preventive actions
- Supports the management in the promotion and improvement of EHS awareness
- Assists in the investigation of any accident / near miss and compiles the necessary reports
- Communicates with EPC Contractor and subcontractors and advises on their EHS matters
- Participates to all EHS meetings (as detailed further in Section 7.1)
- Supports the EPC Contractors' and subcontractors' managers in identifying and assessing the EHS risks of their activities, as well as in defining mitigation measures to control these risks
- Keeps all records as required

Social Specialist – Project Company

- Supports QHSE Engineer in steering and implementing the social component of the EHSS management of Project
- Overall responsibility for implementation of HR, employment and labor management principles and requirements for Sponsor staff (as detailed in Chapter 6)
- Undertake and follow up on HR and labor management audit during construction and operation to ensure EPC Contractors' and O&M Contractor compliance with the relevant requirements (as detailed in Chapter 8)
- Focal Point for all social issues
- Supporting in maintains and updates social rules, regulations and guidelines, local/international requirements as applicable to the project
- Advises on legislative changes concerning social issues which may affect the Project
- Support in developing, maintaining and monitoring relevant social plans (as identified in Section 3.3)
- Assist in reviewing EPC Contractors' and subcontractors' social plans as required
- Ensures the implementation and verification of corrective and preventive actions
- Keeps all records as required

Community Liaison Officer (CLO) – Project Company

- Work under guidance and report to Social specialist
- Monitor and maintain a positive profile of the project with the community and required stakeholders
- Manage day to day interaction with all stakeholders during the construction and operation phase as indicated within the project Stakeholder Engagement Plan (SEP) including (but not limited to) local community members and others
- Implement and manage stakeholder grievance mechanism
- Implement, monitor and report on the implementation of community support initiatives

Owner's Engineer (OE)

Sponsor will appoint an Owner's Engineer (OE) for the project with the objective of ensuring that the EPC Contractors are adhering to the technical project specifications.

OE team will include an HSE officer whom will be mainly responsible for supporting the Sponsor HSE Manager in undertaking and fulfilling his roles and responsibilities as identified earlier.

EPC Contractor

The EPC Contractor will be required to assign a full-time and suitably qualified 1 onsite HSE Manager and 1 Social specialist both of which will be responsible for undertaking the following responsibilities:

- Overall responsibility for development and implementation of EPC Contractors' EHSS Management System requirements (as identified in Section 3.3)
- Ensures the availability of required resources to properly implement the EHSS plans and requirements
- Provides EHSS reporting requirements as relevant (as identified in Section 7.4)

- Provides EHSS training requirements as relevant (as identified in Section 7.2)
- Undertake EHSS inspection and monitoring requirements as relevant (as identified in Section 7.3)
- Organize and participates in EHSS meetings (as discussed in Section 7.1)
- Reports on EHSS incidents
- Ensure that all subcontractors nominate sufficient HSE officers for the overall implementation of EHSS plans and requirements as applicable.

The HSE Manager should be supported by 2-3 (depending on construction schedule) full-time and suitably qualified onsite HSE Officers.

Before commencement of any work onsite, for each of the key site EHSS staff as indicated above, the EPC Contractor should submit the following to the Sponsor for approval:

- Curriculum Vitae (CV)
- Qualification Certificate
- Appointment Letter

The Sponsor will review the submitted documents and might interview the candidates to determine their suitability for the intended roles.

Other Project Personnel

- Cooperates with, and constructively participates in the EHSS plans
- Complies with Project EHSS requirements that apply to an individual's work
- Works within competencies held
- Adheres to procedures to protect safety, the safety of your fellow employees, and the safety of the general public
- Is proactively involved in the EHSS program; this involvement may include some aspects of planning, problem solving, priority setting, training, and improving site specific work practices
- Does not misuse or damage any equipment

2.2 Operational Phase

The figure below presents the organizational structure for the operation phase. Based on the organization structure, this section identifies the lines of authority and roles and responsibilities for those personnel that are involved in the EHSS management during operation.

Project Manager – Sponsor

- Same to Section 2.1 but for operation phase

Head of ESG – Sponsor

- Same to Section 2.1 but for operation phase

QHSE Engineer (TBD) – Sponsor

- Same to Section 2.1 but for operation phase

Community Liaison Officer (CLO) (TBD) – Sponsor

- Same to Section 2.1 but for operation phase

O&M Contractor – TBD

The O&M Contractor will be required to assign a full-time and suitably qualified 1 onsite HSE Manager and 1 Social specialist both of which will be responsible for undertaking the following responsibilities:

- Overall responsibility for development and implementation of O&M Contractors' EHSS Management System requirements (as identified in Section 3.3)
- Ensures the availability of required resources to properly implement the EHSS plans and requirements
- Provides EHSS reporting requirements as relevant (as identified in Section 7.4)
- Provides EHSS training requirements as relevant (as identified in Section 7.2)
- Undertake EHSS inspection and monitoring requirements as relevant (as identified in Section 7.3)
- Organize and participates in EHSS meetings (as discussed in Section 7.1)
- Reports on EHSS incidents
- Ensure that all subcontractors nominate sufficient HSE officers for the overall implementation of EHSS plans and requirements as applicable.

Before commencement of any work onsite, for each of the key site EHSS staff as indicated above, the O&M Contractor should submit the following to the Sponsor for approval:

- Curriculum Vitae (CV)
- Qualification Certificate
- Appointment Letter

The Sponsor will review the submitted documents and might interview the candidates to determine their suitability for the intended roles.

Other Project Personnel

- Similar to Section 2.1 but for operation phase

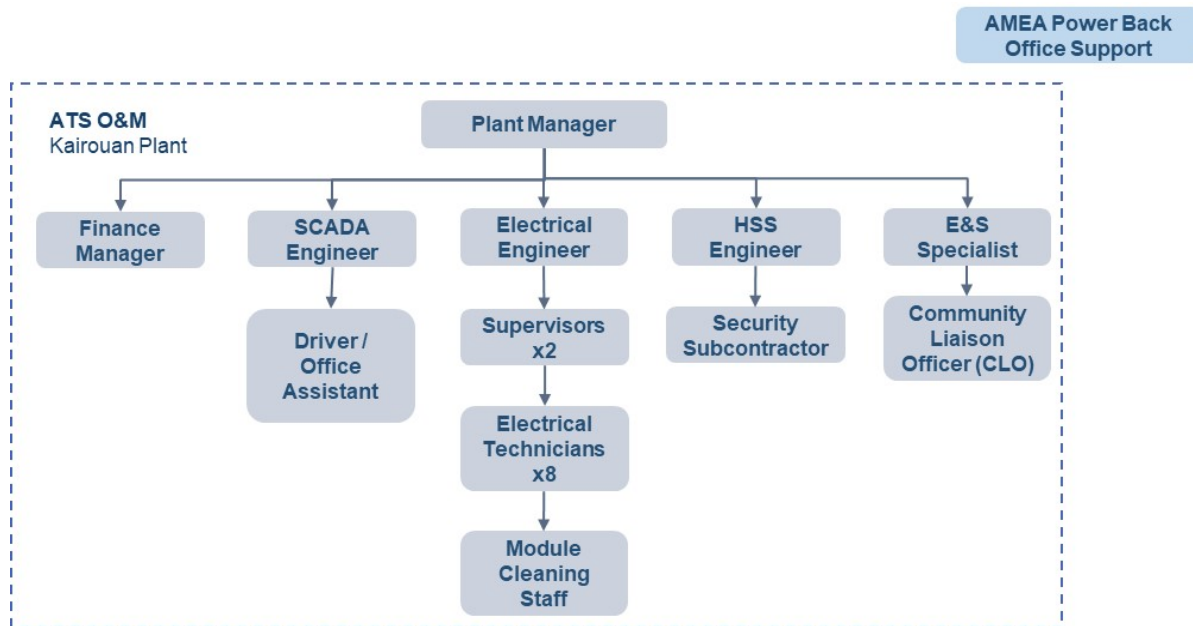


Figure 3: KSP Organizational Structure for Operation Phase

O&M Subcontractors operating on site will have a team of E&S Officers in proportion to the number of workers they actively employ. The requirements are specified in the Contractor Management Plan.

3 OVERALL STRUCTURE OF E&S MANAGEMENT SYSTEM

3.1 Objectives

This document outlines the ESHS MS that will be established and implemented by KSP during the construction and operation phase of the Project. The objectives of this ESHS MS Manual include the following:

- Identification of the overall structure and outline for the ESHS MS that will be implemented for the Project during both construction and operation;
- Identification and outline of the key procedures and plans to be developed at a later stage that will handle the key impacts and risks during construction and operation.
- Identification of an institutional framework to ensure that such procedures and measures are implemented effectively and efficiently. This includes identification of roles and responsibilities, training requirements, monitoring and reporting requirements, and other as applicable;
- Identify approach for periodically auditing entities involved during the construction and operation phase to ensure all EHSS requirements are implemented effectively; and
- Identification of a high-level framework for labour management that should be adhered to during the construction and operation phase.

3.2 EHSS Policy

KSP is committed to the protection of the environment and to the health and safety of its employees, contractors and the local community through all stages of the project life cycle. To achieve this goal, KSP is committed to the following EHSS Policy:

- Comply with all applicable national and local EHSS laws and regulations as well as permitting requirements;
- Meeting internationally-accepted industry best practice EHSS requirements, including those of the relevant International Financing Institutions (IFIs), in specific the IFC Performance Standards, World Bank Group (WBG) General EHS Guidelines;
- Achieve a target of Zero fatalities, Zero injuries and Zero significant environmental accidents
- Assessing and minimizing potential impacts to the community, worker and the environment;
- Establishing and maintaining an ESHS MS which identifies objectives and targets, risks and hazards, responsibilities, and includes systems of monitoring and reporting as well as incident and accident reporting and investigation;
- Realizing continual improvement in EHSS performance by developing indicators, through monitoring and auditing performance, and by implementing corrective actions where needed;
- Reporting externally on EHSS performance and encouraging dialogue with employees, local communities and other stakeholders to promote awareness;
- Setting and achieving targets that promote the efficient use of natural resources;
- Minimizing and managing all waste streams and where waste is generated ensure that it will be handled and disposed of safely and responsibly;
- Providing a place of work that is safe for everyone;
- Supporting and protecting internationally recognized human rights; and

- Ensuring that KSP's employees, and KSP's contractors, are made aware of this Policy and are adequately trained to manage the EHSS risks and impacts of their actions.

KSP will monitor and review this Policy on a regular basis to ensure that it continues to support and encourage a high standard of EHSS performance.

All personnel working for the Project during the construction and operational phase are required to adhere to the requirements of the ESMS, as it provides a basis to ensure that the Project meets its environmental and social obligations. All visitors will also abide by the ESMS.

3.3 HR Policy

KSP is committed to ensuring that all workers and employees involved in the Project are treated fairly and equally. This includes workers directly engaged by KSP and EPC Contractor, workers engaged through third parties to perform work related to core business processes of the project for a substantial duration (contracted workers), as well as we workers engaged by the EPC Contractor's primary suppliers (supply chain workers).

KSP is committed to the following:

- Comply with national applicable national and local HR laws and regulations
- Comply with internationally-accepted industry best practice requirements, including those of the relevant International Financing Institutions (IFIs), in specific the IFC Performance Standards, World Bank Group (WBG) General EHS Guidelines and sector specific Guidelines as applicable
- Provide fair terms and conditions of employment
- Being an equal opportunities employer, with no preference on the basis of personal characteristics such as age, race, nationality, ethnicity, sexual orientation, gender or religion
- Ensuring that all employees have access to appropriate and suitable welfare facilities
- Never using underage or child labor
- Never using any forced or compulsory labor
- Zero tolerance for discrimination, harassment, or hostile and offensive work environment
- All employees have the right to freely join trade unions, where such rights are recognized by law
- Ensure workers have access to a fair and transparent grievance mechanism

All employees are responsible for adhering to and implementing this policy statement. Our business leaders and managers are accountable for monitoring and managing compliance and performance to this policy.

3.4 Overall Structure for Environmental & Social Management System

This section identifies the overall structure for ESHS MS for the Project. This ESHS MS Manual along with the associated management plans identified below are collectively considered the ESHS MS that will be implemented for the construction and operation phase of the Project.

A. Project Company – KSP

This ESHS MS Manual, along with the assessment studies and the associated management plans and programs identified below are the ESHS plans and documents that have been prepared and are to be implemented by KSP. Such associated management plans should be read in conjunction with this ESHS MS Manual.

- **Environmental and Social Impact Assessment (ESIA):** The Environmental and Social Management Plan (ESMP) is the key outcome of the ESIA. ESMP requirements are to be implemented by KSP, the EPC Contractor and O&M Contractor as applicable. Relevant requirements of the ESMP are to be included within the relevant management plans discussed throughout this section.
- **Stakeholder Engagement Plan (SEP):** identifies a structured approach for stakeholder consultation and engagement to be implemented by KSP during the construction and operation phase. The SEP also includes a stakeholder grievance mechanism.
- **ESMS Manual:** i.e. this document, which is to be implemented by KSP.
- **Code of conduct:** the document which will be implemented by KSP employees and all the workforce.

B. EPC Contractor – TBD

The table below identifies the components of the ESHS MS that will be required from the EPC Contractor. The following components identified below will be specifically applicable and are to be implemented by the EPC Contractor and subcontractors involved. Additional details on the requirements of such plans and the overall framework are provided in “Chapter 5”.

N.	ACRONYM	QUALITY, HEALTH, SAFETY, SOCIAL, SECURITY AND ENVIRONMENTAL MANAGEMENT SYSTEM
MAIN DOCUMENTS		
1	ESMS	ESMS Manual
2	POL	QHSE Policies
3	LEG	Legal Register (Regulatory Framework)
4	PER	Permits Register
QUALITY		
5	ISO	ISO Certifications
6	QMP	Quality Management Plan
7	CMP	Contractor Management Plan
8	DCP	Document Control Plan
9	COMM	Communication Plan
10	PMP	Project Management Plan
11	ORG	Organisation Chart (HSSE staff Project Specific)

N.	ACRONYM	QUALITY, HEALTH, SAFETY, SOCIAL, SECURITY AND ENVIRONMENTAL MANAGEMENT SYSTEM
HEALTH & SAFETY		
12	MOB	Site Mobilization Plan
13	OHSP	Occupational Health & Safety Management Plan
14	EPRP	Emergency Preparedness and Response Plan
15	HMMP	Hazardous Material Management Plan
16	CHSP	Community H&S and worker influx plan
17	TMP	Traffic and Transportation Management Plan
18	TRMP	Training Management Plan
ENVIRONMENTAL MANAGEMENT		
19	NMP	Noise Management Plan
20	AQDP	Air Quality and Dust Management Plan
21	WMP	Water Management Plan
22	WMP	Waste Management Plan
23	BMP	Biodiversity Management Plan
SOCIAL		
24	LWCMP	Labour and Working Conditions Management Plan
25	GEP	Gender Equality Plan
26	ACC	Accommodation Plan
27	ARCH	Archaeological and Cultural Heritage - Chance Find Procedure
SECURITY		
28	SMP	Security Management Plan

The above documents must be submitted to KSP for approval before commencement of construction activities onsite.

C. O&M Contractor – TBD

During the O&M period, the Contractor will prepare separate operational QHSE Management System in a structure matching the one included in the previous section. All the Policies, Manuals, Plans and Procedures shall be Project-specific and will refer to all the activities that will be carried out during the operational phase. The QHSE Management System for the operational phase shall be compliant with the section of the ESIA relating to operations and its associated commitments, including mitigations and management plans and any conditions imposed by regulatory authorities. Additional details on the requirements of such plans and the overall framework are provided in "Chapter 5".

The above documents must be submitted to KSP for approval before commencement of operation activities onsite.

3.5 Key Impacts Anticipated during Planning and Construction

The tables below present the anticipated impacts from the Project during the construction and operation phase of the Project. In addition, the table also identifies the relevant management plans which includes the procedures and measures for handling the identified impact/risk and ensure it is eliminated or reduced to the greatest extent possible, as well as overall implementation responsibility.

TABLE 1: KEY ANTICIPATED IMPACTS DURING CONSTRUCTION

Receptor	Anticipated Impact	ESMS Document	Overall Implementation
Hydrology and Hydrogeology	Risk of soil and groundwater contamination during the various construction activities from improper waste management.	Waste Management Plan	EPC Contractor
		Hazardous Material Management Plan	EPC Contractor
Archaeology and Culture Heritage	Improper management of construction activities could disturb/damage potential archaeological remains which could be buried in the ground (if any).	Chance Find Procedure	EPC Contractor
Air Quality and Noise	Construction activities will likely result in an increased level of dust, particulate matter and pollutant emissions as well as noise levels which could affect workers as well as nearby receptors.	Air Quality and Noise Control Plan	EPC Contractor
Infrastructure and Utilities	Project could affect existing capacity of infrastructure and utilities related to water supply entailing constraints on the existing resources and users.	Water Management Plan	EPC Contractor
	If transportation activities of the various project components to the site are not properly managed beforehand, they could entail risk of damage to the existing roads and could be of public safety concerns to other users on the road as well as workers on site.	Traffic and Transport Management Plan	EPC Contractor
Community Health, Safety and Security	This could include but not limited to the following risks on nearby local communities: (i) trespassing of unauthorized personnel; (ii) potential impacts from presence of security personnel due to inappropriate management and conduct of security personnel towards the local communities; (iii) potential impacts from workforce influx during construction.	Worker Influx and Accommodation Plan	EPC Contractor
		Security Management Plan	EPC Contractor
		Stakeholder Engagement Plan	KSP

Receptor	Anticipated Impact	ESMS Document	Overall Implementation
Socio-economic	The Project is expected at a minimum to provide job opportunities for local communities as well as a social responsibility program. This, to some extent, could contribute to enhancing the living environment for its inhabitants, elevate their standards of living, and bring social and economic prosperity to local communities. It is important to note that most of these jobs are not long term and mostly during the construction phase and some of these jobs may not be for people from the closest community to the project.	Stakeholder Engagement Plan	KSP
		Community Impact and Development Plan	KSP
Occupational Health and Safety	There will be some risks to workers' health and safety from the various construction activities anticipated.	Occupational Health and Safety Plan	EPC Contractor
		Emergency Preparedness and Response Plan	EPC Contractor
Labour	Inappropriate management of the workforce and labour working conditions during the various phase to include recruitment, employment, workplace, etc.	Labour and Working Conditions Management Plan	EPC Contractor
Biodiversity	Improper management of construction activities could disturb/damage site ecology and habitats to include flora, fauna and birds mainly those used to be encountered within the IBA of Metbasta.	Biodiversity Management Plan	EPC Contractor

TABLE 2: KEY ANTICIPATED IMPACTS DURING OPERATION

Receptor	Anticipated Impact	ESMS Document	Overall Implementation
Hydrology and Hydrogeology	Risk of soil and groundwater contamination during the various operation activities from improper waste management.	Waste Management Plan	O&M Contractor
		Hazardous Material Management Plan	EPC Contractor
Infrastructure and Utilities	Project could affect existing capacity of infrastructure and utilities related to water supply	Water Management Plan	O&M Contractor

Receptor	Anticipated Impact	ESMS Document	Overall Implementation
	entailing constraints on the existing resources and users.		
Community Health, Safety and Security	This could include potential Impacts from presence of security personnel relate to inappropriate management and conduct of security personnel towards the local communities.	Security Management Plan	O&M Contractor
		Stakeholder Engagement Plan	KSP
Socio-economic	The Project is expected at a minimum to provide job opportunities for local communities as well as a social responsibility program. This could contribute to enhancing living environment for its inhabitants, elevate their standards of living, and bring social and economic prosperity. However, it is important to note that this phase will require fewer personnel hence fewer job opportunities will be available.	Stakeholder Engagement Plan	KSP
		Community Impact and Development Plan	KSP
Occupational Health and Safety	There will be some risks to workers' health and safety from the various operation and maintenance activities anticipated.	Occupational Health and Safety Plan	O&M Contractor
		Emergency Preparedness and Response Plan	EPC Contractor
Labour	Inappropriate management of the workforce and labour working conditions during the various phase to include recruitment, employment, workplace, etc.	Labour and Working Conditions Management Plan	EPC Contractor
Biodiversity	Improper management of O&M activities could disturb/damage site ecology and habitats to include flora, fauna and avi-fauna. In addition, potential impacts on avi-fauna in particular from collisions with panels due to 'lake effect'.	Biodiversity Management Plan	O&M Contractor

3.6 ESIA and Supporting Documents Information Disclosure

It is of utmost necessity to ensure that stakeholders are kept well informed about the Project throughout its life cycle, thus information will be accessible to the public, key stakeholders, and local communities through dissemination of related documents.

Information about the Project is made accessible to stakeholders and the broad public through a disclosure package that includes the following key documents, available publicly in Arabic, French and English language.

- Environmental and Social Impact Assessment (ESIA) of Kairouan Solar Plant;
- Environmental and Social Impact Assessment (ESIA) for the associated Overhead Transmission Line (OHTL);
- Non-Technical Summary (NTS) **available publicly in Arabic**;
- Stakeholder Engagement Plan (SEP);
- Resettlement Action Plan (RAP);
- ESMS Manual;
- Environmental and Social Action Plan (ESAP)

The above documents are available at the following avenues:

- Project Company Website (www.ameapower.com). The documentation above will remain at the website for the life of the project.
- AfDB and IFC Websites
- Ministry of Energy, STEG and ANPE Websites.
- Hard copies available at the governorate of Kairouan, the delegations of Sbikha and Kairouan Nord.

Soft copies can also be made available to stakeholders via email

4 LEGAL AND POLICY FRAMEWORK

The ESHS MS has been prepared taking into account all environmental, health, safety, and social legislations that are applicable in Tunisia and for the Project – to include laws, regulations, instructions, and standards as issued by the various applicable governmental entities.

In addition, the Project is seeking financing from International Financing Institutions (IFI). Therefore, the ESMS Manual has also been prepared taking into account Good International Industry Practice (GIIP) requirements, in particular IFC Performance Standards and applicable WBG EHS Guidelines.

National Legislations

The table below identifies the relevant legal requirements that must be taken into account as part of the associated management plans identified in Section 3.4 earlier.

TABLE 3: NATIONAL EHSS LEGISLATIONS

Attribute	Key Legislations	Reference Document
Water Resources	<ul style="list-style-type: none"> Water Code n° 75-16 of 31 March 1975 	Water Management Plan
Waste and Hazardous Material Management	<ul style="list-style-type: none"> Law No. 96-41 of 10 June 1996 Decree No. 2005-2317 of 22 August 2005 Decree no. 2005-3395 of 26 December 2005 Decree No. 2008-2565 of 7 July 2008 Circular of the Ministry of Commerce of 12 May 1987 The law N° 96-41 of 10 June 1996 The law N° 97-37 of 2 June 1997 Decree No. 85-56 of 2 January 1985 Decree No. 2000-2339 dated 10 October 2000 Decree No. 2005-3079 of 29 November 2005 The Order of the Minister of Local Affairs and the Environment and the Minister of Industry and Small and Medium Enterprises of 26 March 2018 Order of the Minister of the Environment and Sustainable Development dated 23 March 2006 Order of the Minister of the Environment and Sustainable Development dated 17 January 2007 Decree No. 2009-1064 of 13 April 2009 	Waste Management Plan
		Hazardous Material Management Plan

Air Quality and Noise	<ul style="list-style-type: none"> Law n° 2007-34 dated 4 June 2007 Decree n°2010-2519 dated 28 September 2010 Decree n°2018-447 of 18 May 2018 Order of the President of the Municipality, Mayor of Tunis of 22 August 2000 Decree n°84-1556 of 29 December 1984 	Air Quality and Noise Management Plan
Traffic and Transport	<ul style="list-style-type: none"> Law n°2004-33 of April 19, 2004, 	Traffic and Transport Management Plan
Labour management and Worker Accommodation	<ul style="list-style-type: none"> 	Worker Influx and Accommodation Plan
		Labour and Working Conditions Management Plan
Occupational Health and Safety	<ul style="list-style-type: none"> Law no. 66-27 of April 30 Decree No. 75-240 of April 24, 1975, amending Decree No. 67-391 of November 6, 1967 Decree n°68-328 of October 22, 1968 Decree 75-503 of July 28, 1975 Law n° 87-31 du 06 July 1987 Law No. 94-28 of 21 February 1994 Order of the Ministers of Public Health and Social Affairs establishing the list of occupational diseases of 10 January 1995 Order of the Minister of Industry, Energy and SMEs of November 15, 2005 Decree no. 2006-2687 of 9 October 2006 Law n°2009-11 of March 02, 2009 	Occupational Health and Safety Plan
Emergency Preparedness	<ul style="list-style-type: none"> Law no. 66-27 of April 30 	Emergency Preparedness and Response Plan

Security Arrangement	▪	Security Management Plan
Archaeology and Cultural Heritage	▪ The Heritage Code (Law 94-35 of 24 February 1994	Chance Find Procedure
Biodiversity	<ul style="list-style-type: none"> ▪ The Forestry Code, promulgated in 1966 and recast in 1988 ▪ Law 92-72 of 3 August 199 ▪ Order of the Minister of Agriculture of 29 June 2006 ▪ Order of the Minister of Agriculture and Water Resources of 19 July 2006) 	Biodiversity Management Plan

International Finance Corporation (IFC)

The IFC of the World Bank provides a range of guidance documents related to the assessment and management of environmental and social issues in project development. Not only does IFC guidance provide a generally accepted basis for good practice, but it also provides the technical cornerstone for the Equator Principles which set out the environmental and social requirements of banks for project finance. The IFC requirements have become the *de facto* international environmental and social performance benchmark for project financing.

The IFC Performance Standards on Social and Environmental Sustainability set out a framework for managing and improving project performance from planning and assessment, through construction and operations to closure. The Performance Standards include the following:

- PS1: Assessment and Management of Environmental and Social Risks and Impacts
- PS2: Labour and Working Conditions
- PS 3: Resource Efficiency and Pollution Prevention
- PS 4: Community Health, Safety and Security
- PS 5: Land Acquisition and Involuntary Resettlement
- PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- PS 7: Indigenous Peoples (not applicable for this Project).
- PS 8: Cultural Heritage

In addition, there are also General EHS Guidelines document that are produced by World Bank Group (WBG) and which are considered applicable for the IFC. Such EHS guidance document provides detailed management and technical recommendations with regards to GIIP. This EHS guidance document provides detailed management and technical recommendations with regards to Industry Best Practice.

The above should also be considered as part of the associated management plans identified in Section 3.4 earlier.

African Development Bank (AfDB)

AfDB's has an environmental safeguard system (2015) to manage environmental and social risks. The Integrated Safeguards System is a tool for identifying risks, reducing development costs and improving project sustainability. It promotes best practices and encourages transparency and accountability. The following safeguards are particularly relevant to the Project:

- OS 1: Environmental and Social assessment
- OS 2: Involuntary Resettlement, Land Acquisition, Population Displacement and Compensation
- OS 3: Biodiversity and Ecosystem Services
- OS 4: Pollution Prevention and Control, Hazardous Materials and Resource Efficiency
- OS 5: Labour Conditions, Health and Safety

The above should also be considered as part of the associated management plans identified in Section **Erreur ! Source du renvoi introuvable.** earlier.

In addition, the ESMS manual has also been developed in accordance with other key GIIP E&S requirements which are summarized below.

GIIP Requirement	Summary and Relevance
International Labour Organization (ILO LO Conventions	Tunisia has ratified the 8 fundamental conventions of the ILO related to forced labour, freedom of association, right to collective bargaining, equal remuneration, abolition of forced labour, discrimination, minimum age and child labour.
IFC Good Practice Notes	<p>IFC issues good practice notes that are related to EHS management of development projects. The key relevant good practice notes include the following:</p> <ul style="list-style-type: none"> – IFC Good Practice Note on Non-Discrimination and Equal Opportunity – IFC Good Practice Note – Managing Retrenchment – IFC Handbook for Labour and Working Conditions - Measure & Improve Your Labour Standards Performance – EBRD and IFC Guidance Note on Worker's accommodation – IFC Good Practice Note – Addressing Grievances from Project-Affected Communities – IFC Good Practice Manual – Doing Better Business Through Effective Public Consultation and Disclosure – IFC Handbook – ESMS Implementation
UN Requirements for Security Management	<p>UN issued several charters related to security force management. The key items that are applicable to the project include:</p> <ul style="list-style-type: none"> – UN Basic Principles on Use of Force & Firearms by Law Enforcement Officials – UN Code of Conduct for Law Enforcement Officials – UN Voluntary Principles on Security and Human Rights

5 MANAGEMENT PLAN FRAMEWORK

As discussed previously in “Chapter 3” of this document, the EPC Contractor and O&M Contractor are required to prepare several environmental and social management plans to be submitted to KSP for approval before commencement of any construction or O&M work.

This Chapter provides additional details on the overall framework required for the management plan to be considered as applicable.

WATER MANAGEMENT PLAN				
Objective	Identification of procedures for onsite management of water supplies and minimization of water consumption.			
Responsibility	EPC Contractor and their subcontractors (construction phase) O&M Contractor and its subcontractors (operation phase)			
Spatial applicability	KSP Project site + supply location			
Guiding legislations and reference	Local legislations: <ul style="list-style-type: none">– Water Code n° 75-16 of 31 March 1975 Lender requirements: <ul style="list-style-type: none">– IFC PS 3 and associated Guidance Note, AfDB OS 4, WBG EHS General Guidelines			
Required action/planning	<ul style="list-style-type: none">▪ Identification of sources of water supply that will be utilized for the Project, to include both potable and non-potable water requirements▪ Estimation of anticipated quantities of potable and non-potable water requirements▪ Identify in detail procedures for onsite management of water supplies and minimization of water consumption. This could include but not limited to: (i) identify location of all water storage tanks onsite with clear markings as potable/non-potable; (ii) ensure water tanks are completely closed at all times with appropriate protection against sunlight; (iii) inspections for potable and non-potable tanks and connections to ensure there are no leaks; (iv) install water saving fittings (taps, urinals, etc.) in toilets of site offices, and other as applicable.▪ Reflect the procedural actions for water management in: (i) induction training material for workers; and (ii) repeated/refresher Toolbox Talks (TBT)▪ Identify Key Performance Indicators (KPI) for implementation of plan▪ Identify roles and responsibilities for implementation of plan			
Monitoring requirements	<ul style="list-style-type: none">▪ Monitoring program shall be at a minimum based on the following schedule <table><tr><td>Parameters</td><td>As per parameters included in Decree 458/2007</td></tr></table>		Parameters	As per parameters included in Decree 458/2007
Parameters	As per parameters included in Decree 458/2007			

WATER MANAGEMENT PLAN

	Location	Potable water tanks (if applicable)
	Frequency	Quarterly
	Duration	1 sample
	Prerequisite	Discuss with EEAA and agree on details of this program
	Review	As applicable based on project updates and as required by related parties (regulator, Project Company, lender, etc.)
Reporting Requirements	<ul style="list-style-type: none"> Continuous inspection and reporting by EHS staff 	
	<ul style="list-style-type: none"> Monthly water consumption report to KSP 	

WASTE AND WASTEWATER MANAGEMENT PLAN

Objective	Identification of procedures for onsite management and final disposal of generated waste to include solid waste (municipal and construction), wastewater and hazardous waste.
Responsibility	EPC Contractor and their subcontractors (construction phase) O&M Contractor and its subcontractors (operation phase)
Spatial applicability	KSP Project site + disposal facility
Guiding legislations and reference	<p>Local legislations:</p> <ul style="list-style-type: none"> - Law No. 96-41 of 10 June 1996 - Decree No. 2005-2317 of 22 August 2005 - Decree no. 2005-3395 of 26 December 2005 - Decree No. 2008-2565 of 7 July 2008 - Circular of the Ministry of Commerce of 12 May 1987 - The law N° 96-41 of 10 June 1996 - The law N° 97-37 of 2 June 1997 - Decree No. 85-56 of 2 January 1985 - Decree No. 2000-2339 dated 10 October 2000 - Decree No. 2005-3079 of 29 November 2005 - The Order of the Minister of Local Affairs and the Environment and the Minister of Industry and Small and Medium Enterprises of 26 March 2018

WASTE AND WASTEWATER MANAGEMENT PLAN

	<ul style="list-style-type: none"> - Order of the Minister of the Environment and Sustainable Development dated 23 March 2006 - Order of the Minister of the Environment and Sustainable Development dated 17 January 2007 - Decree No. 2009-1064 of 13 April 2009 <p>Lender requirements:</p> <ul style="list-style-type: none"> - IFC PS 3 and associated Guidance Note, AfDB OS4, WBG EHS General Guidelines
Required action/planning	<ul style="list-style-type: none"> ▪ Inclusion of a waste inventory which identifies the source and anticipated quantities of each waste stream; ▪ Identify final disposal location of each waste streams (solid waste (municipal and construction), wastewater and hazardous waste). In addition, confirm that disposal locations identified are well managed and have sufficient capacity to receive amounts generated from project without affecting other projects and users. ▪ Identify in detail the waste management procedures to be implemented to manage impacts. This could include but not limited to: (i) contract arrangement with official entity responsible for collection and final disposal of waste streams; (ii) specifications of waste containers, bins and collection areas to be utilized for onsite disposal; (iii) utilization of waste manifests by contractors; (iv) identification and consideration of recycling and reuse measures for waste streams; (v) prohibition of fly-dumping of waste streams to the land, and other. ▪ Final disposal inspection procedure to ensure such facilities are operated and management in accordance with Good International Industry Practice (GIIP). This should include the solid waste, wastewater and hazardous waste disposal facility. ▪ Reflect the procedural actions for waste management in: (i) induction training material for workers; and (ii) repeated/refresher Toolbox Talks (TBT) ▪ Identify Key Performance Indicators (KPI) for implementation of plan ▪ Identify roles and responsibilities for implementation of plan
Monitoring requirements	<ul style="list-style-type: none"> ▪ Continuous inspection and reporting by EHS staff
Reporting Requirement	<ul style="list-style-type: none"> ▪ Monthly waste generation report supported with waste manifests to KSP

HAZARDOUS MATERIAL MANAGEMENT PLAN

Objective	Identification of procedures for onsite management, handling and storage of hazardous materials that will be used for the various construction activities onsite
Responsibility	EPC Contractor and their subcontractors (construction phase)

HAZARDOUS MATERIAL MANAGEMENT PLAN	
	O&M Contractor and its subcontractors (operation phase)
Spatial applicability	KSP Project site
Guiding legislations and reference	<ul style="list-style-type: none"> ▪ Local legislations: <ul style="list-style-type: none"> - The law N° 96-41 of 10 June 1996 - The law N° 97-37 of 2 June 1997 - Decree No. 2000-2339 dated 10 October 2000 - Decree No. 2005-3079 of 29 November 2005 - Order of the Minister of the Environment and Sustainable Development dated 23 March 2006 - Order of the Minister of the Environment and Sustainable Development dated 17 January 2007 - Decree No. 2009-1064 of 13 April 2009 ▪ Lender requirements: <ul style="list-style-type: none"> - IFC PS 3, WBG EHS General Guidelines
Required action/planning	<ul style="list-style-type: none"> ▪ Inclusion of a hazardous material inventory which identifies the source and anticipated quantities of each material; ▪ Identification of a hazardous material entry procedure ▪ Identification of a hazardous material labelling procedure ▪ Identification of a hazardous material storage procedure ▪ Identification of a refuelling procedure ▪ Reflect the procedural actions for hazardous material management in: (i) induction training material for workers; and (ii) repeated/refresher Toolbox Talks (TBT) ▪ Identify Key Performance Indicators (KPI) for implementation of plan ▪ Identify roles and responsibilities for implementation of plan
Monitoring requirements	<ul style="list-style-type: none"> ▪ Continuous inspection and reporting by EHS staff
Reporting Requirement	<ul style="list-style-type: none"> ▪ Monthly report to KSP

AIR QUALITY AND NOISE MANAGEMENT PLAN	
Objective	Identification of procedures to ensure that air pollutant and noise sources are properly managed and controlled onsite.
Responsibility	EPC Contractor and their subcontractors

AIR QUALITY AND NOISE MANAGEMENT PLAN															
Spatial applicability	KSP Project site														
Guiding legislations and reference	<ul style="list-style-type: none"> Local legislations: <ul style="list-style-type: none"> Law n° 2007-34 dated 4 June 2007 Decree n°2010-2519 dated 28 September 2010 Decree n°2018-447 of 18 May 2018 Order of the President of the Municipality, Mayor of Tunis of 22 August 2000 Decree n°84-1556 of 29 December 1984 Lender requirements: <ul style="list-style-type: none"> IFC PS 3, WBG EHS General Guidelines 														
Required action/planning	<ul style="list-style-type: none"> Identify sources of air quality pollutants and noise Identify in detail the air quality and noise management procedures to be implemented which could include but not limited to: (i) equipping workers with proper Personal Protective Equipment related to dust and noise control (e.g. masks, eye goggles, breathing masks, ear muffs, etc.); (ii) regular watering of construction active areas (e.g. containment, covering, bundling); (iii) proper management of stockpiles and excavated material, (iv) adhering to a 25 km/h speed limit onsite; (v) proper covering of trucks transporting aggregates and fine materials and other. Reflect the procedural actions for air quality and noise management in: (i) induction training material for workers; and (ii) repeated/refresher Toolbox Talks (TBT) Identify Key Performance Indicators (KPI) for implementation of plan Identify roles and responsibilities for implementation of plan 														
Monitoring requirements	<ul style="list-style-type: none"> Monitoring programme shall be at a minimum based on the following schedule <table border="1"> <tr> <td>Parameters</td><td>Total Suspended Particulate, PM10 and Noise</td></tr> <tr> <td>Location</td><td>2 locations (upwind and downwind)</td></tr> <tr> <td>Frequency</td><td>Quarterly</td></tr> <tr> <td>Duration</td><td>24 hours per point</td></tr> <tr> <td>Reporting</td><td>Quarterly report</td></tr> <tr> <td>Prerequisite</td><td>Discuss with EEAA and agree on details of this program</td></tr> <tr> <td>Review</td><td>As applicable based on project updates and as required for related parties (regulator, Project Company, lender, etc.)</td></tr> </table> Continuous Inspection and reporting by health and safety staff 	Parameters	Total Suspended Particulate, PM10 and Noise	Location	2 locations (upwind and downwind)	Frequency	Quarterly	Duration	24 hours per point	Reporting	Quarterly report	Prerequisite	Discuss with EEAA and agree on details of this program	Review	As applicable based on project updates and as required for related parties (regulator, Project Company, lender, etc.)
Parameters	Total Suspended Particulate, PM10 and Noise														
Location	2 locations (upwind and downwind)														
Frequency	Quarterly														
Duration	24 hours per point														
Reporting	Quarterly report														
Prerequisite	Discuss with EEAA and agree on details of this program														
Review	As applicable based on project updates and as required for related parties (regulator, Project Company, lender, etc.)														

AIR QUALITY AND NOISE MANAGEMENT PLAN

Reporting Requirements	<ul style="list-style-type: none"> Quarterly air quality and noise monitoring report to KSP
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SOIL AND GROUNDWATER MANAGEMENT PLAN

Objective	Identification of procedures to ensure all potential impacts on soil and groundwater resources are properly managed throughout the project development.
Responsibility	EPC Contractor and their subcontractors (construction phase)
Spatial applicability	Project site
Guiding legislations and reference	<ul style="list-style-type: none"> Local legislations: <ul style="list-style-type: none"> Law 88-91 of 2 August 1988 Decree No. 2005 - 1991 of 11 July 20 Lender requirements: <ul style="list-style-type: none"> IFC PS 1 and associated Guidance Note, AfDB OS1, WBG EHS General Guidelines
Required action/planning	<ul style="list-style-type: none"> Identification of procedures for control of erosion and runoff to include in particular: (i) avoid executing excavation works under aggressive weather conditions; (ii) place clear markers indicating stockpiling area of excavated materials to restrict equipment and personnel movement, thus limiting the physical disturbance to land and soils in adjacent areas; (iii) erect erosion control barriers around work site during site preparation and construction to prevent silt runoff where applicable; (iv) return surfaces disturbed during construction to their original (or better) condition to the greatest extent possible. Reflect the procedural actions in: (i) induction training material for workers; and (ii) repeated/refresher Toolbox Talks (TBT) Identify Key Performance Indicators (KPI) for implementation of plan Identify roles and responsibilities for implementation of plan
Monitoring requirements	<ul style="list-style-type: none"> Continuous inspection and reporting by EHS staff
Reporting Requirement	<ul style="list-style-type: none"> Quarterly report on implementation of plan to Sponsor

TRAFFIC AND TRANSPORT MANAGEMENT PLAN	
Objective	Promotion of safe driving and vehicle management practices both onsite and offsite to protect workers and members of the public
Responsibility	EPC Contractor and their subcontractors (construction phase)
Spatial applicability	KSP Project site
Guiding legislations and reference	<ul style="list-style-type: none"> Local legislations: <ul style="list-style-type: none"> Law n°2004-33 of April 19, 2004 Lender requirements: <ul style="list-style-type: none"> IFC PS 4 and associated Guidance Note, AfDB OS 5, WBG EHS General Guidelines
Required action/planning	<ul style="list-style-type: none"> Identification of project traffic requirements related to PV panels, equipment/machinery/materials, project workers and other based on a monthly basis Identification of types of vehicles to be utilized Identify in detail procedures for onsite management of traffic. This could include but not limited to: (i) optimization of internal traffic layout so that delivery and other vehicles will be able to access site easily; (ii) identification of requirements for controlling access to the site (e.g. security checkpoint, registration, etc.); (iii) providing appropriate lighting for roads and pedestrian walk and ensure they are segregated; (iv) utilization of appropriate and sufficient traffic signs onsite (e.g. speed limits); (v) barricading of open trenches and excavated pits; (vi) utilization of banksmen and flaggers and other. Identify requirements to be adhered to and enforced on all haulage suppliers Identification of a code of conduct to be adhered to and enforced on all drivers in the Project Identification of speed limits onsite and identification of all traffic signage requirement onsite Identification of a procedure for management of onsite/offsite traffic accidents Reflect the procedural actions for traffic management in: (i) induction training material; and (ii) repeated/refresher Toolbox Talks (TBT) Identify Key Performance Indicators (KPI) for implementation of plan Identify roles and responsibilities for implementation of plan
Monitoring requirements	<ul style="list-style-type: none"> Continuous inspection and reporting by EHS staff
Reporting Requirements	<ul style="list-style-type: none"> Monthly update report on implementation of required action/planning requirements to KSP

WORKER INFLUX AND ACCOMMODATION PLAN	
Objective	Define minimum health and safety standards and principles for worker accommodation and ensure impacts on community health and safety from worker influx are managed and controlled.
Responsibility	EPC Contractor and their subcontractors (construction phase)
Spatial applicability	Offsite (depending on accommodation location)
Guiding legislations and reference	<ul style="list-style-type: none"> ▪ Lender requirements: <ul style="list-style-type: none"> - IFC PS 2 and associated Guidance Note, AfDB OS 5, WBG EHS General Guidelines - IFC's and EBRD's Worker Accommodation Guidance Note
Required action/planning	<ul style="list-style-type: none"> ▪ Identification of the number of workers expected per month and anticipated accommodation requirements of all involved subcontractors ▪ Identification of accommodation facilities in Ras Ghareb city (availability of hotels, suites, apartments, and other) ▪ Assessment of worker influx to Ras Ghareb city at a cumulative level taking into account other developments in the Project area with parallel and/or overlapping construction schedule and which require accommodation to include pressure on infrastructure, services and utilities ▪ Identify in detail procedures for accommodation to include but not limited to: (i) number of beds per person; (ii) maximum occupants per room; (iii) separate rooms for male/female occupants; (iii) requirements for en-suite bathroom/toilet, ventilation, designated eating areas, waste facilities; (iv) ensuring high degree of safety and security, including information on evacuation procedures and other. ▪ Identification in detail of a medical examination program for all workers ▪ Identification of awareness raising material for communicable diseases ▪ Regular stakeholder engagement by CLO with local community regarding potential influx of workers from other regions ▪ Identification of a Labour Code of Conduct as well as Accommodation Rules and Regulations ▪ Reflect the procedural actions for worker accommodation management in: (i) induction training material; and (ii) repeated/refresher Toolbox Talks (TBT) ▪ Identify Key Performance Indicators (KPI) for implementation of plan ▪ Identify roles and responsibilities for implementation of plan
Monitoring requirements	<ul style="list-style-type: none"> ▪ Continuous inspection and reporting by EHS staff

WORKER INFLUX AND ACCOMMODATION PLAN

Reporting Requirements	<ul style="list-style-type: none"> Monthly update report on implementation of required action/planning requirements to KSP
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OCCUPATIONAL HEALTH AND SAFETY PLAN

Objective	Establish procedures that describe the manner in which activities will be carried out to protect and promote workers health and safety and safeguarding of personnel and property
Responsibility	<p>EPC Contractor and their subcontractors (construction phase)</p> <p>O&M Contractor and its subcontractors (operation phase)</p>
Spatial applicability	KSP Project site
Guiding legislations and reference	<ul style="list-style-type: none"> Local legislations: <ul style="list-style-type: none"> Law no. 66-27 of April 30 Decree No. 75-240 of April 24, 1975, amending Decree No. 67-391 of November 6, 1967 Decree n°68-328 of October 22, 1968 Decree 75-503 of July 28, 1975 Law n° 87-31 du 06 July 1987 Law No. 94-28 of 21 February 1994 Order of the Ministers of Public Health and Social Affairs establishing the list of occupational diseases of 10 January 1995 Order of the Minister of Industry, Energy and SMEs of November 15, 2005 Decree no. 2006-2687 of 9 October 2006 Law n°2009-11 of March 02, 2009 Lender requirements: <ul style="list-style-type: none"> IFC PS 2 and associate, AfDB OS5, WBG EHS General Guidelines
Required action/planning	<ul style="list-style-type: none"> Inclusion of a Job Safety Analysis (JSA) and Risk and Hazard Assessment for work activities Identification of a Permit to Work System requirements and procedure Identification of a Lock Out-Tag Out System requirements and procedures Identification of occupational health and safety signage requirements to be implemented Identification of medical support requirements Identify in detail the occupational health and safety management procedures to be implemented for each work activity to include personnel protective equipment requirements; management measures, and other as applicable Identification of rest and sanitary facilities

OCCUPATIONAL HEALTH AND SAFETY PLAN

	<ul style="list-style-type: none"> ▪ Identification of specific actions and procedures related to COVID-19 (social distancing requirements, test requirements, and other as applicable). ▪ Identification of specialized technical training requirements as related to this plan and activities to be undertaken (e.g. training for working at height, electrical works, etc.) ▪ Reflect the procedural actions for occupational health and safety in: (i) induction training material for workers; and (ii) repeated/refresher Toolbox Talks (TBT) ▪ Identify Key Performance Indicators (KPI) for implementation of plan ▪ Identify roles and responsibilities for implementation of plan
Monitoring requirements	<ul style="list-style-type: none"> ▪ Continuous inspection and reporting by EHS staff
Reporting Requirements	<ul style="list-style-type: none"> ▪ Monthly update report on implementation of required action/planning requirements to KSP

EMERGENCY PREPAREDNESS AND RESPONSE PLAN

Objective	Establish a series of organizational, operational and preventive measures in the event of an emergency that are adapted to the circumstance of such situations, which in turn will ensure the safety of workers and property within the specific project site
Responsibility	<p>EPC Contractor and their subcontractors (construction phase)</p> <p>O&M Contractor and its subcontractors (operation phase)</p>
Spatial applicability	KSP Project site
Guiding legislations and reference	<ul style="list-style-type: none"> ▪ Local legislations: <ul style="list-style-type: none"> - Environmental Law 4/1994 and its Amendments Law 9/2009 ▪ Lender requirements: <ul style="list-style-type: none"> - IFC PS 2 and 4, WBG EHS General Guidelines
Required action/planning	<ul style="list-style-type: none"> ▪ Inclusion of requirements for an emergency responder team that includes at a minimum first aiders and firefighters that receive appropriate and certified training ▪ Inclusion of requirements to undertake emergency drills in coordination with external emergency response services if required (e.g. civil defence, nearest hospital, etc.) ▪ Identify in detail of emergency procedures to be implemented to include first actions, alerting emergency contacts, site evacuation, communicating with external emergency services

EMERGENCY PREPAREDNESS AND RESPONSE PLAN

	<ul style="list-style-type: none"> ▪ Identification in details of emergency control measures to include but not limited to fire, personnel accidents, spillage, sandstorms, heats strokes, and other. ▪ Identification of location of assembly points onsite ▪ Identification of emergency signs to be implemented onsite ▪ Reflect the procedural actions for emergency preparedness and response in: (i) induction training material for workers; and (ii) repeated/refresher Toolbox Talks (TBT) ▪ Identify Key Performance Indicators (KPI) for implementation of plan ▪ Identify roles and responsibilities for implementation of plan to include establishment of an emergency committee and assigning roles to an emergency manager
Monitoring requirements	<ul style="list-style-type: none"> ▪ Continuous inspection and reporting by EHS staff
Reporting Requirements	<ul style="list-style-type: none"> ▪ Emergency Report (upon occurrence)

SECURITY MANAGEMENT PLAN

Objective	Identification of procedures for the overall management of security and asset-protection of the project site with specific regard for human rights.
Responsibility	<p>EPC Contractor and their subcontractors (construction phase)</p> <p>O&M Contractor and their subcontractors (operation phase)</p>
Spatial applicability	KSP Project site
Guiding legislations and reference	<ul style="list-style-type: none"> ▪ Lender requirements: <ul style="list-style-type: none"> - IFC PS 4, WBG EHS General Guidelines - The Voluntary Principles on Security and Human Rights
Required action/planning	<ul style="list-style-type: none"> ▪ Identification in detail of site security arrangements that will be implemented onsite to include security guards, fencing, CCTV, and other as applicable ▪ Identification of security operating procedures to include: (i) control of site access, and (ii) security force management to include security roles, provision and composition of security force, equipment requirement of security force, use of force, ▪ Identification of incident response procedure ▪ Development of a code of conduct and use of force policy

SECURITY MANAGEMENT PLAN

	<ul style="list-style-type: none"> Reflect the procedural actions for security management in: (i) induction training material; and (ii) repeated/refresher Toolbox Talks (TBT) Include specialized training to security personnel to avoid use of excessive force Identify Key Performance Indicators (KPI) for implementation of plan Identify roles and responsibilities for implementation of plan
Monitoring requirements	<ul style="list-style-type: none"> Continuous inspection and reporting by EHS staff
Reporting Requirements	<ul style="list-style-type: none"> Monthly update report on implementation of required action/planning requirements to KSP

CHANCE FIND PROCEDURE

Objective	Establish a procedure to avoid or reduce adverse effects to undiscovered archaeological remains during the construction phase of the Project
Responsibility	EPC Contractor and their subcontractors (construction phase)
Spatial applicability	KSP Project site
Guiding legislations and reference	<ul style="list-style-type: none"> Local legislations: <ul style="list-style-type: none"> The Heritage Code (Law 94-35 of 24 February 1994) Lender requirements: <ul style="list-style-type: none"> IFC PS 8, , AfDB OS 1, WBG EHS General Guidelines
Required action/planning	<ul style="list-style-type: none"> Identification of procedures to be implemented to include onsite notification measures, onsite management measures (e.g. delineation and marking of site, etc.), communication with relevant authority, etc. Reflect the procedural actions for chance find in: (i) induction training material for workers; and (ii) repeated/refresher Toolbox Talks (TBT) Identify Key Performance Indicators (KPI) for implementation of plan Identify roles and responsibilities for implementation of plan
Monitoring requirements	<ul style="list-style-type: none"> Continuous inspection and reporting by EHS staff
Reporting	<ul style="list-style-type: none"> Chance find report (upon occurrence)

LABOUR AND WORKING CONDITIONS MANAGEMENT PLAN

Objective	Establish the key requirements to ensure acceptable and decent labour and working conditions are maintained for all the workforce involved in the construction phase of the Project
Responsibility	EPC Contractor and their subcontractors (construction phase) O&M Contractor (operation phase)
Spatial applicability	KSP Project site
Guiding legislations and reference	<ul style="list-style-type: none"> Local legislations: Lender requirements: <ul style="list-style-type: none"> IFC PS 2, AfDB OS2, WBG EHS General Guidelines
Required action/planning	<ul style="list-style-type: none"> Provide an overview of the labour use on the project Provides the policies applicable to this plan to include but not limited to an HR policy, anti-corruption and bribery policy, alcohol and drug use policy and ethics policy. Identifies a recruitment and procurement procedure to be implemented for the local communities to be involved in the project Identifies a Human Resources (HR) Management Procedure for the workforce that will ensure decent and humane working conditions, worker rights, and enhance constructive work floor relations Identifies a disciplinary procedure for the workforce to be implemented Identifies a worker welfare procedure related to drinking water, rest areas, sanitary facilities, changing rooms and other Identifies a worker grievance procedure to manage all worker related complaints and grievances Reflect the procedural actions for hazardous material management in: (i) induction training material for workers; and (ii) repeated/refreshers Toolbox Talks (TBT) Identify Key Performance Indicators (KPI) for implementation of plan Identify roles and responsibilities for implementation of plan
Reporting Requirements	<ul style="list-style-type: none"> Monthly update summary report on worker grievances and resolutions

WORKER GRIEVANCE MECHANISM

Objective	A robust and comprehensive procedure to capture, document, resolve and close out any worker complaint, whether classified as grievances or not.
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Responsibility	EPC Contractor and their subcontractors (construction phase) O&M Contractor (operation phase)
Spatial applicability	Project site
Guiding legislations and reference	<ul style="list-style-type: none"> ■ Lender requirements: <ul style="list-style-type: none"> - IFC PS 2 and associated Guidance Note, AfDB OS 5, WBG EHS General Guidelines
Required action/planning	<ul style="list-style-type: none"> ■ Identification of a step-by-step process and guideline to ensure that every complaint/grievance made by workers are registered, documented and fully addressed ■ The overall outline/structure of the grievance mechanism will be as follows: <ul style="list-style-type: none"> - Workers will be allowed to lodge grievances through various platforms and channels to include grievance boxes distributed onsite, telephone, face to face meetings with responsible personnel, workers' representatives and unions. Contact details for all such channels will be identified and provided in detail. - Anonymous lodging of grievances will be allowed. - All grievances will be recorded and a case handler will be assigned and whom will be determined at a later stage. - All grievances will be handled in the shortest possible period. The first approach will be to inform the worker within the first 24 hours after receiving the grievance. The worker will be informed within 7 working days on whether or not the grievance proceeds and what the next steps will be. - Once a resolution has been agreed or a decision made, the case handler will monitor the implementation of the response. - After the implementation of an agreed resolution has been verified the grievance close-out will take place. It will entail reaching a unanimous agreement, clearly communicated to avoid misunderstandings. - A close-out report will be prepared with evidence to support closure (e.g. photos). ■ Reflect the procedural actions for worker grievance mechanism in: (i) induction training material for workers; and (ii) repeated/refresher Toolbox Talks (TBT) ■ Identify Key Performance Indicators (KPI) for implementation of plan ■ Identify roles and responsibilities for implementation of plan
Reporting Requirements	<ul style="list-style-type: none"> ■ Monthly update summary report on worker grievances and resolutions

BIODIVERSITY MANAGEMENT PLAN

Objective	Establish a procedure to avoid or reduce adverse effects to the project site habitat and ecology and all its components (to include flora, fauna and avi-fauna) during the construction and operation phase of the Project
Responsibility	EPC Contractor and their subcontractors (construction phase)

	O&M Contractor and its subcontractors (operation phase)
Spatial applicability	Project site
Guiding legislations and reference	<ul style="list-style-type: none"> Local legislations: <ul style="list-style-type: none"> The Forestry Code, promulgated in 1966 and recast in 1988 Law 92-72 of 3 August 199 Order of the Minister of Agriculture of 29 June 2006 Order of the Minister of Agriculture and Water Resources of 19 July 2006 Lender requirements: <ul style="list-style-type: none"> IFC PS 6 and associated Guidance Note, AfDB OS 3, WBG EHS General Guidelines
Required action/planning	<ul style="list-style-type: none"> Undertake an additional flora/fauna/avifauna species inventory during the wet season to verify the absence of protected species that might present within the Project site. Identification of procedures to be implemented to include onsite code of conduct and onsite management measures such as: (i) carrying out clearing works and earthworks during the dry period ; (ii) clean the machines before their arrival on the site; (iii) Avoid Boushkima stream vicinities to preserve wet habitat especially during the wet season; (iv) ensuring proper worker code of conduct such as proper housekeeping and waste management, prohibiting hunting and collection of flora/fauna species, etc. Identify details for a bird mortality program to be implemented during the operation phase Reflect the procedural actions for chance find in: (i) induction training material for workers; and (ii) repeated/refreshers Toolbox Talks (TBT) Identify Key Performance Indicators (KPI) for implementation of plan Identify roles and responsibilities for implementation of plan
Monitoring requirements	<ul style="list-style-type: none"> Continuous inspection and reporting by EHS staff
Reporting	<ul style="list-style-type: none"> Flora/fauna/avifauna species inventory report (once before commencement of construction) Bird mortality program report (annually during operation)

TRAINING MANAGEMENT PLAN

Objective	Identification of procedures and framework for Environment, Health, Safety (EHS) training for all relevant personnel to include but not limited to workers and visitors.
Responsibility	<p>EPC Contractor and their subcontractors (construction phase)</p> <p>O&M Contractor and its subcontractors (operation phase)</p>
Spatial applicability	Project site

Guiding legislations and reference	<ul style="list-style-type: none"> Local legislations: <ul style="list-style-type: none"> - Not relevant Lender requirements: <ul style="list-style-type: none"> - IFC PS 1 and associated Guidance Note, AfDB OS1, WBG EHS General Guidelines
Required action/planning	<ul style="list-style-type: none"> Identification of strategy and requirements for training and awareness for the workforce Identification of requirements for basic visitor induction training with inclusion of training material Identification of worker site induction training with inclusion of training material Identification of Tool Box Talk (TBT) training requirements with inclusion of training material Submit competency needs assessment and training matrix for the workforce as per their job description to identify other training requirements as applicable (e.g. OHS, emergency preparedness and response, waste management, etc.) Identify Key Performance Indicators (KPI) for implementation of plan Identify roles and responsibilities for implementation of plan
Monitoring requirements	<ul style="list-style-type: none"> Continuous inspection and reporting by EHS staff
Reporting Requirement	<ul style="list-style-type: none"> Monthly report on implementation of plan to Sponsor

EMPLOYMENT AND PROCUREMENT MANAGEMENT PLAN

Objective	Identification of procedures and framework to ensure a systematic, fair and transparent employment and procurement process is undertaken with the local communities throughout the development of the Project.
Responsibility	<p>EPC Contractor and their subcontractors (construction phase)</p> <p>O&M Contractor and its subcontractors (operation phase)</p>
Spatial applicability	Project site
Guiding legislations and reference	<ul style="list-style-type: none"> Local legislations: <ul style="list-style-type: none"> - Not relevant Lender requirements: <ul style="list-style-type: none"> - IFC PS 1 and associated Guidance Note, AfDB OS1, WBG EHS General Guidelines
Required action/planning	<ul style="list-style-type: none"> Undertake consultations with relevant local entities (e.g. Governor) to discuss/agree on overall implementation mechanism for employment and procurement including order of priority of local community settlement, announcement mechanisms, collection of existing worker/subcontractor databases, and other as applicable Identification of number of job opportunities targeted for local communities to include skilled and unskilled workers Identification of details on how job opportunities will be announced;

	<ul style="list-style-type: none"> ▪ Employment selection procedure that is fair and transparent and provides equal opportunities for all including females; ▪ Identification of procurement opportunities targeted for local communities to include for example local subcontractors, local supplies and services, etc.; ▪ Identification on how procurement opportunities will be announced ▪ Procurement section procedure that is fair and transparent and provides equal opportunities for ▪ Identify Key Performance Indicators (KPI) for implementation of plan ▪ Identify roles and responsibilities for implementation of plan
Monitoring requirements	<ul style="list-style-type: none"> ▪ Continuous inspection and reporting by EHS staff
Reporting Requirement	<ul style="list-style-type: none"> ▪ Monthly report on implementation of plan to Sponsor

6 FRAMEWORK FOR LABOR MANAGEMENT

6.1 Human Resources Policy

The Sponsor is committed to treating its employees and service providers fairly, equally and without prejudice. This means respecting all individuals, regardless of ethnic origin, creed, age or gender. To achieve this goal, the Sponsor is committed to the People Policy that is presented in Annex 2.

The Sponsor will monitor and review this Policy on a regular basis to ensure that it continues to support and encourage a high standard of human resources performance.

6.2 Labor Management

The Sponsor is committed to adhering to the below principles and requirements on labor, employment and workplace safety. Such requirements should also be implemented and taken into account by all involved entities in the Project to include EPC Contractor, O&M Contractor and all involved subcontractor to these entities.

Local and International Requirements

The Sponsor will operate in strict compliance with all applicable national and local laws and regulations related to labour, employment, and workplace safety.

The Sponsor will meet all internationally-accepted industry best practices requirements of the relevant International Financing Institutions (IFIs) related to labour, employment and workplace safety to include in particular "IFC Performance Standard 2: Labour and Working Conditions" and "AfDB's OS 5: Labour Conditions, Health and Safety".

Working Conditions and Terms of Employment

All workers will be provided with a written contract of employment which will include details on the following. In addition, where workers are illiterate, these contracts will be explained verbally before signature.

- Nature, type of work and job responsibilities;
- Wage and time of payment highlighting minimum wage requirements in country;
- Compulsory payments such as medical, life and social insurance and other benefits to include in cash and in kind as agreed along with details on compensation in case of injury;
- Contract duration;
- Hours of work required and rest hours
- Overtime payment
- Rest days
- Leave and public holidays
- Provision of potable water supply
- Medical check requirements
- Induction training requirements

Additionally, it applies the following:

- Wages will be fair (i.e. that meets basic needs to maintain a safe, decent standard of living) and based on qualifications and competencies, professional experiences, allocated roles and job responsibilities, wages at equivalent positions, and other factors as appropriate. Such criteria will be applied to all workers to include migrant workers and women in specific. In any case, the determined wage shall not be less than the minimum wage in accordance with local laws and regulations.
- All wages will be paid on time and directly to the worker as set in the contract terms.
- Each employee will be provided with a copy of the Code of Ethics (Annex 4) and will be required to sign it. Where workers are illiterate, the document will be explained verbally before signature.
- All workers will be entitled to leaves (to include annual leaves, sick leaves, maternity leaves, bereavement leave) in accordance with local labour laws and legislations.
- All workers should be required to work in accordance with working hours set within local labour laws and legislations taking into account rest or break hours. In addition, working extra hours beyond those specific above is allowed (with the consent of the worker), however in this case the employee will be entitled for overtime hours as agreed in the contract.
- Engagement of casual and day workers will adhere to requirements identified above to include specifically contract, wages, leaves, working hours, non-discrimination and equal opportunity, child labour, young workers, forced labour, etc.
- In specific, it will be ensured that all casual and day workers are covered by social, life and medical insurance as appropriate and they will be informed on this as part of recruitment process through inclusion in contracts and verbal explanation.

Foreign Workers

- Engagement of foreign workers will adhere to requirements identified through this section to include specifically contract, wages, leaves, working hours, non-discrimination and equal opportunity, child labour, young workers, forced labour, etc.
- Confiscation of personal documents of the foreign workers by their employers is strictly forbidden.
- No fees, commissions or deductions from salary should be asked from foreign workers upon promise of employment at the Project.

Non-Discrimination and Equal Opportunity

- The Sponsor is committed to being an equal opportunity employer and will not practice any discrimination based on personal characteristics – this includes gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disability, age, or sexual orientation. In addition, the Sponsor has no tolerance for harassment, intimidation, exploitation or hostile and offensive work environment.
- The above will apply to the entire work cycle and for all workers including vulnerable workers to include: recruitment and hiring, compensation (wages and benefits), working conditions and terms of employment including maternity and family rights, assignment of jobs, termination of employment, and disciplinary actions.

Child Labor and Young Workers

- A child is considered any person less than 18 years of age. Sponsor is committed to never using child labour the project development.

- Persons between 16 and 18 years of age will not be employed under any circumstances in construction activities, but can be employed for office activities that do not entail H&S risks, such as interns, support staff, etc.

Forced Labor

- The Sponsor is committed to never using any forced or compulsory labour. Forced labour is any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty.
- All workers in the workforce will be recruited voluntarily and is allowed to terminate his/her contract at his/her own free will.

Workers Organization and Freedom of Association

- The Sponsor recognizes workers' rights to form and to join workers' organizations of their choosing without interference and to bargain collectively.
- The Sponsor is committed to allowing all employees to form or join workers' organization without interference and to bargain collectively in compliance with Tunisian laws.
- The Sponsor will not discriminate or retaliate against any worker, what soever, if they chose to participate or seek to participate, in any worker organization.

Health and Safety

- The Sponsor is committed to providing a safe work place that ensures all employees and contractors work in safe conditions where suitable procedures are provided and maintained.
- The Sponsor is committed to ensuring all employees and subcontractors have ready access to sanitation facilities, potable water, food and/or food preparation, storage and eating facilities, and suitable accommodation and welfare facilities.

Worker Grievance Mechanism

- All works must have access to an effective grievance mechanism that is easily accessible to raise any workplace concerns. The mechanism must address concerns promptly, using an understandable and transparent process that provides timely feedback, without any retribution.
- The grievance mechanism must have the option to submit a grievance anonymously, be it through placement in a private area or otherwise, and its implementation must respect the workers' rights to privacy. Grievance boxes will be located at suitable locations on site and any worker accommodations.
- To ensure that all workers are aware of the internal grievance mechanism, induction training for all employees will include information on the procedure for submitting grievances, how grievances will be handled, and the Project's no retaliation policy.
- The Sponsor will not discriminate or retaliate against any worker, should they choose to seek legal actions for resolution of his/her grievance.

Worker Code of Conduct

- The Project is committed to maintaining good relations with, and ensuring the health and safety of, its workers, neighbours and other communities potentially affected by the Project. All workers will be required to uphold the highest Code of Conduct at all times. The Code of Conduct is presented in Annex 3.
- The objective of the Code of Conduct is to avoid or minimize as much as possible, in line with relevant laws, international standards and good industry practices, any risks and negative impact that may be a

consequence of the interaction between the Workers and the local population in the Project's Area of Influence

COVID-19

- All staff members will be required to monitor on a daily basis WHO and National Health Instructions and Decisions related to COVID-19. In addition, workers will also abide with all governmental issued instructions and decisions related to COVID-19
- All workers will be required to abide by the specific COVID-19 protocols that will be implemented both onsite and offsite. This could include but not limited to the following:
 - Temperatures screening checks for workforce. Any workers whom member appears to have symptoms (s)he will be immediately separated from others, provided a face mask if they are not using one, and sent home with instructions and guidance on how to follow-up with their healthcare provider. In addition, (s)he may be required to undertake a COVID-19 test. In this case the team member will be asked to home quarantine for at least 14 days
 - Utilizing alternative methods of communication with stakeholders where and as relevant to include phone communication and virtual meetings (e.g. zoom)
 - Required to wear a facemask at all times
 - Equipped with hand sanitizers
 - Encourage workers who have symptoms of COVID-19 or who have a sick family member at home with COVID-19 to notify their direct manager and stay home.
 - For office work/compound, ensure: (i) no more than 4 desks will be located in any room; (ii) appropriate ventilation will be maintained in every room at all times; (iii) desks will be located at least 2m apart; (iv) each desk will be equipped with a hand sanitizer

Anticorruption and Bribery

- No favouritism or nepotism shall be practiced based on kinship, origins, political affiliation, etc.
- Bribery is strictly prohibited to anyone, at any time and for any reason. Special care should be taken into account when giving gifts, paying for meals, entertainment or other business courtesies especially if you are dealing with government officials. Avoid the possibility that such business courtesies could be perceived as a bribe, best to provide courtesies infrequently and to keep their value moderate.

Disciplinary Actions

Whether through audits or through any other source of information (e.g. grievance mechanism) it comes to the attention of the Sponsor any worker does not comply with the requirement set forth within this Chapter (Framework for Labor Management) and its associated requirements, the following will apply:

- Sponsor will issue a verbal warning to the respective worker which provides details on the incident and justification for issuing the warning.
- Depending on the severity of the incident as determined by the Sponsor, a written formal warning could be issued to the worker as well.
- Should the incident be repeated (and depending on the severity) a similar process to the above will be undertaken and another written formal warning will be issued.

Should the incident be repeated for a third time, discussions will be undertaken between the Sponsor and the worker to impose contractual/financial penalties which could lead to termination

7 EHSS TRAINING REQUIREMENTS

To achieve the approach to EHSS management, all personnel will receive the required training. Training will not be undertaken as a one-off but instead will be continually refreshed as part of on-going site training programs focused on the training needs of construction personnel. Training will be provided for all new recruits and continual refresher courses will be established for staff to attend as needed according to the updated risk identification as need as well as operational changes or incidents.

The following identifies the EHSS meetings that will be undertaken for the Project throughout the construction and operation phase.

7.1 Basic Visitor Safety Induction

The EPC Contractor and O&M Contractor will be responsible for providing to all visitors arriving at the project site at any point with an induction training before commencement of any activity at the working site. This is considered to be applicable to any visitor whether from the Project Company, EPC Contractor/O&M Contractor, and /or any involved subcontractors.

The induction training will be deliverable through a presentation at the site offices upon arrival of the visitor as per the requirements included in the table below. Each person who completes the induction will acknowledge by signing attendance sheet.

E&S Attribute	Key Topics	Responsibility	Location	Target
General	<ul style="list-style-type: none">- Project introduction and overview- E&S Policy	EPC Contractor HSE Manager	Project Site	All visitors
Waste Management	<ul style="list-style-type: none">- Principle of waste segregation and color coding- Location of waste bins and waste storage areas- Hygiene requirements- Signage	O&M Contractor HSE Manager		
Emergency Preparedness and Response	<ul style="list-style-type: none">- Emergency contact details- Emergency signs- Assembly points and evacuation routes			
Water Management	<ul style="list-style-type: none">- Water conservation and efficiency measures			
Traffic and Transportation	<ul style="list-style-type: none">- Pedestrians and vehicle occupants requirements			
OHSP	<ul style="list-style-type: none">- Key safety signs- PPE requirements- Basic information on hazards			

7.2 Worker Site Induction Training

The EPC Contractor/ O&M Contractor will be responsible for providing to all workers involved, including staff and workforce of Project Company, EPC Contractor/ O&M Contractor, and all involved subcontractors an induction training before the commencement of any activity at the working site.

The induction training will be deliverable through a presentation at an agreed date that will be communicated to the newly recruited workers in advance.

Attendance for the induction training is mandatory for all staff and workforce. Any new employee at any level (Project Company, EPC Contractor, O&M Contractor, subcontractors) during the project should receive the same induction training.

All attendees will be required to sign an attendance sheet and a training register shall be maintained onsite.

E&S Attribute	Key Topics	Responsibility	Location	Target
General	<ul style="list-style-type: none"> - Project introduction and overview - E&S Policy - Organizational capacity and structure 	EPC Contractor HSE Manager	Project Site	All workers
Waste Management	<ul style="list-style-type: none"> - Principle of waste segregation and color coding - Location of waste bins and waste storage areas - Hygiene requirements - Signage 	O&M Contractor HSE Manager		
Emergency Preparedness and Response	<ul style="list-style-type: none"> - Emergency procedure - Key emergency incidents and responses - Emergency contact details - Emergency signs - Assembly points and evacuation routes 			
Water Management	<ul style="list-style-type: none"> - Water conservation and efficiency measures - Location of potable and non-potable water tanks and markings/coloring indication - Emphasize that any leaks must be reported immediately 			
Air Quality and Noise	<ul style="list-style-type: none"> - Dust control requirement - Noise control requirements 			
Chance Find	<ul style="list-style-type: none"> - Emphasize that buried archaeological remains may be encountered - Importance of ceasing work immediately in any area where suspected remains are encountered - Notifying the EPC Contractor HSE Manager immediately 			
Traffic and Transportation	<ul style="list-style-type: none"> - Traffic signs - Speed limits - Driver's instructions 			

E&S Attribute	Key Topics	Responsibility	Location	Target
	<ul style="list-style-type: none"> - Defensive driving - Driving under adverse weather conditions 			
OHSP	<ul style="list-style-type: none"> - Key safety signs: helmet, mask, live electricity, no access, first aid - PPE requirements - Permit to Work procedure - Lock-Out Tag-Out procedure (LOTO) 			
Working Conditions and Labor Management	<ul style="list-style-type: none"> - HR Policy - Worker rights / terms of employment - Worker Code of conduct - Gender Based Violence and Harassment (GBVH) Code of Conduct - Disciplinary procedure requirements - Worker welfare requirements to include drinking water, rest areas, sanitary facilities, and changing rooms - Worker grievance procedure - Gender sensitization - COVID-19 requirements and procedures - Human rights 			
Community Management	<ul style="list-style-type: none"> - Community relations and interactions - Cultural sensitization, local culture, and sensitivities - Code of Conduct - Communicable diseases - Conflict de-escalation - Community grievance mechanism 			
Worker accommodation	<ul style="list-style-type: none"> - Cultural sensitization, local culture, and sensitivities - Personal hygiene - Food and catering - Amenities - Security arrangements - Worker grievance mechanism as relevant - Emergency evacuation procedure - How to obtain medical assistance - Gender aspects - Communicable diseases 			

7.3 Regular Tool-Box Talk (TBT)

Toolbox Talks (TBT) will be used as an integral element of EHSS risk and hazard management that aid in promoting EHSS awareness in construction sites with the with the potential to reduce EHSS accident rates. TBT have a two-fold objective which include:

- TBT arranged before the commencement of any dangerous or non-routine activities, in order to address any task-specific E&S issues. Those are referred to as Task TBT (e.g. working at height Task TBTs before workers are involved in such an activity). Tasks TBT are to be undertaken for the specific workforce before commencement of new activities onsite by that workforce. More than 1 TBT could be delivered on the same day before commencement of new activities onsite taking into account the overall project schedule and activities to be undertaken.
- TBT arranged to reinforce specific E&S measures and requirement. Those are referred to as General TBT (e.g. waste management practices, worker grievance mechanism, etc.). General TBTs are to be undertaken on a daily basis. Each day a specific TBT can be selected as applicable to be discussed with the workforce onsite taking into account the overall project schedule.

In general, the duration of each TBT should not exceed 10-15 minutes. The TBT will be delivered by the EPC Contractor/ O&M Contractor HSE Officers and/or HSE Manager to include both the Task TBT and General TBT

EPC Contractor / O&M Contractor is responsible for preparing a TBT schedule for the entire construction and operation duration. In addition, all TBTs should be documented and updated within the training register.

7.4 Specialized Training Requirements

There are other requirements related to specialist E&S training that must be undertaken for the workforce. In some cases, such trainings are required to be undertaken by specialist third-party entities while in other instances those can be provided by the EPC Contractor/ O&M Contractor HSE Manager.

The table below identifies such key specialist training procedures. All the below should be documented and updated within the training register.

Training	Reference Plan	Requirement
Emergency Responders	Emergency Preparedness and Response Plan	This will include first aiders and firefighters and it will be ensured that for each 20 employees at any time, there will be two (2) first aiders and two (2) fire fighters. The selected first aiders should receive training on first aid while the selected fire fighters should receive training on firefighting before deployment onsite as emergency responders. Such training should be provided by a certified third-party entity. Typically, this could include a specialized E&S training center or could be the relevant local government entity involved in emergency response such as the Civil Defense. Training certificates shall be provided upon completion of the training and maintained onsite at all times. Any new emergency responder assigned to a team at any point should receive the emergency response training as discussed above.

Training	Reference Plan	Requirement
Hazardous Material Handlers	Hazardous Materials Management Plan	Only trained workers will be allowed to handle hazardous materials. Such a training will be provided by the EPC Contractor HSE Manager before commencement of construction activities that will include the following components: (i) hazardous material labels meaning and requirements; (ii) hazardous material storage and segregation requirements; (iii) potential risks to health and safety; (iv) precautions to prevent exposure; (v) correct use and application of PPE and clothing; and (vi) appropriate response to spillage, incidents and accidents. Any new handler assigned to a team at any point should receive the training as discussed above. Refresher trainings for hazardous material handlers should be undertaken every 6 months.
Haulage Company Drivers	Traffic and Transport Management Plan	A third-party contractor(s) will be engaged to undertake specific transportation requirements for the project. The third-party contractor(s) will be required to provide training to drivers on safe driving practice. Such a requirement will be included in contractual agreements and the haulage company will be required to provide the following before commencement of any transportation activities: (i) training certificates; (ii) training material; (iii) attendance sheet; and (iv) signed "Drivers Instructions" by each driver. Any driver appointed at a later stage must undergo similar training and similar documentation to be provided.
Crane and Telehandler operators	Traffic and Transport Management Plan	Inspections should be undertaken for the operators of the cranes and Telehandler through a third-party specialized company. Certification for the operator to operate the machinery should be provided by the third-party prior to any operations onsite. Such certifications should be renewed as required by the third-party inspectors. Any driver appointed at a later stage must undergo similar inspection and similar documentation to be provided.
Security Workers	Security Management Plan	A third-party contractor will be engaged to provide security services for the project. The third-party contractor will be required to provide training to the security workers on the following: (i) security policy and human rights policy; (ii) security Force Code of Conduct; (iii) security guards arrangement, behavior and duties; (iv) site access requirements and overall management; (v) incident management and communication; (vi) use of force. Such a requirement will be included in contractual agreements and the third-party contractor will be required to provide the following before deployment of security staff onsite: (i) training certificates; (ii) training material; (iii) attendance sheet; and (iv) signed Code of Conduct and Use of Force Policy. Any driver appointed

Training	Reference Plan	Requirement
		at a later stage must undergo similar training and similar documentation to be provided.
Occupational Health and Safety	Occupational Health and Safety Management Plan	All workers regardless of whether from the Project Company, EPC Contractor, O&M Contractor, or subcontractor must attend a specialized occupational health and safety training that should be completed prior to an employee being exposed to hazards of a given work task. The EPC Contractor/ O&M Contractor HSE Manager will establish when, what and who shall involve in such specialized occupational health and safety training sessions based on the needs as identified through an Occupational Health and Safety (OHS) risk assessment process (refer to OHSP for additional details). Refresher trainings should be undertaken every 3 months. Any new employee at any level (EPC Contractor, O&M Contractor or subcontractors) during the project should receive the same specialized occupational health and safety training as required above. All attendees will be required to sign an attendance sheet.
Use of Personal Protective Equipment (PPEs)	Occupational Health and Safety Plan	All workers shall be trained in the use of PPE and their competence will be assessed in order to evaluate that their knowledge is appropriate to undertake the specific tasks. The training shall be carried out by the EPC Contractor/ O&M Contractor HSE Manager. The training topics shall include: (i) discussion of the specific hazards to be controlled by using the assigned PPEs; (ii) when and under what circumstances the workers must wear or use the assigned PPE; (iii) how the assigned PPE will protect the workers; (iv) limitations of PPE effectiveness; (v) how to properly use PPEs, including instructions on how to put it on or take it off and ensuring they are comfortable and effectively fits; (vi) warning signs related to the use of PPEs; (vii) how to properly clean and maintain PPEs; (viii) how to properly dispose of damaged or obsolete PPEs; (ix) how to request for PPEs replacement. All attendees will be required to sign an attendance. Refresher trainings should be undertaken every 3 months.

7.5 Competency Needs

The EPC Contractor/ O&M Contractor Project Manager shall ensure that Project personnel (EPC, O&M Contractor and Subcontractors) are competent to deliver their responsibilities as per their job descriptions and shall identify and assess any training requirements.

Description of the key roles are provided in the Organisational Capacity section of this Manual and the Roles and Responsibilities sections of the Management Plans.

Subcontractors shall demonstrate, prior to the start of work, that their workers have the skills and experience to comply with the Project obligations relevant for the positions they will be filling.

7.6 Training Evaluation

The EPC/ O&M Contractor HSE Manager will assess the effectiveness of the Induction, ESMS training and any other specific environmental training programs (toolbox talks) through the use of feedback forms and tests (written or visual).

The results of site inspections will inform the need to modify the training matrix and for additional specific training. This process should also identify any areas of training that are failing and need improvement, including the need for follow up sessions.

7.7 Training Records

The EPC / O&M Contractor HSE Manager shall maintain all environmental and social competence and training records outlined below, including job description sheets, training materials, attendance sheets and feedback forms.

Records of induction training, training sessions and toolbox talks shall be produced, retained, and made available for inspection during audits. As a minimum, training records shall identify:

- Type of training;
- Description and purpose of training;
- Date;
- Location;
- Attendees; and
- Trainer.

The records will include pictures of the training events.

Feedback forms and tests to assess training effectiveness will also be recorded and documented

8 EHSS MEETING REQUIREMENTS

This section identifies the overall requirements that will be implemented for EHSS meetings during the construction and operation phase. The following identifies the EHSS meetings that will be undertaken for the Project throughout the construction and operation phase.

Weekly Meetings

During construction, a weekly EHSS meeting must be organized by the EPC Contractor and subcontractors' HSE Manager/Officers and Social Specialist (as applicable). EPC Contractor will notify KSP and OE team on the time and date of meeting for relevant personnel to attend, if required. The agenda of these meetings shall cover at least the following items:

- Summary of items addressed at the previous meeting and determination whether they have been solved or not
- EHSS incidents, near misses or situations at risk identified during the previous week
- Special resources needed by EPC Contractor and subcontractors for coming week, especially in terms of safety equipment and supervision
- Specific awareness communication to implement onsite
- Training needs
- Personal Protective Equipment (PPE) requirements

The weekly EHSS meetings may be combined with other meetings (e.g. weekly coordination meeting) as far as the above topics are discussed and addressed and the presence of the required participants is ensured. EPC Contractor is required to maintain minutes of meeting and attendees register.

During the operation phase, no weekly EHSS meetings are required.

Monthly Meetings

During construction, the monthly EHSS meeting is organized by the KSP Construction Manager and involves the following personnel (as appropriate):

- KSP EHSS Manager
- KSP Social Specialist
- KSP CLO
- OE Team as applicable
- EPC Contractor Project Manager
- EPC Contractor HSE Manager and HSE Site Supervisors
- EPC Contractor Social Specialist
- Contractor and subcontractors HSE Managers/Officers as applicable

The agenda of these meetings shall cover at least the following items:

- Summary of the items addressed at the previous meeting and determination whether they have been solved or not
- Discussion on work assignments (if they have changed), equipment placement if it is variable, and ensure work flow is efficient and safe
- Conditions of the work place to include housekeeping, hygiene, hazards, etc.

- Overview of accident/incident trends
- EHSS training program
- New and outstanding safety issues
- Audits and inspections outcomes (as applicable)
- Accidents (type, severity, frequency, etc.)

Throughout the monthly EHSS meeting, minutes of meeting will be undertaken by the EPC Contractor and shall be taken and circulated after the meeting to attendants. In addition, attendees register will also be maintained.

During operation, monthly EHSS meetings will be undertaken in a similar approach to the above that will involve O&M Contractor.

Management Review

At least quarterly, the EHSS performance of the Project will be reviewed and the associated EHSS program will be assessed and amended. This review has the following objectives: (i) assess the relevance and effectiveness of the actions implemented during the last 3 months; and (ii) define the objectives and actions that will improve the level of EHSS performance and culture.

The management review shall include the following:

- A summary of the effectiveness of each Plan and document proposed updates, changes and improvements.
- For plans under EPC/ O&M Contractor responsibility, the draft for management discussion will be prepared by the EPC Contractor / O&M Contractor HSE Manager.
- For plans under the Project Company responsibility, the draft for management discussion will be prepared by the KSP EHSS Manager.

This review will be chaired by KSP Project Manager. The topics addressed shall include at least:

- The accidents (type, severity, frequency, etc.)
- EHSS inspections' outcomes
- EHSS training program
- EHSS performance and compliance to ESMS on environment, health, safety, social, and security aspects
- Management of contractor and subcontractors
- Modifications and updates based on lessons learned (e.g. implementation of preventive measures to avoid a near miss, based on past experiences)
- EHSS organization

To perform this review, the following inputs are required:

- E&S and HR Audits reports
- Complaints (related to worker grievances or community grievances)
- EHSS Incident and Non-Compliance Reports
- Key Performance Indicator (KPI) data

9 EHSS Inspection and Monitoring

EHSS inspection and monitoring will be carried out to ensure compliance with national and international best practice requirements as set out in the EHSS plans as appropriate. A three-tiered approach will be applied to the monitoring of the Project performance, as follows:

- Daily Site Tours to be undertaken by EPC Contractor (during construction) and O&M Contractor (during operation)
- Weekly Site Inspection to be undertaken by EPC Contractor (during construction) and O&M Contractor (during operation)
- Audits to be undertaken by KSP
- Audits to be undertaken by the EPC Contractor (for construction phase only)

Daily Site Tours

The EPC Contractor's HSE Manager and O&M Contractor's HSE Manager will be required to undertake a daily safety inspection and monitoring at the site. He/she shall prepare a daily observation report stating therein the corrective measures on observed safety deficiencies, unsafe acts and conditions. The observations shall be communicated to the concerned partners and subcontractor for their action. Copies of the daily inspection reports shall be kept on site by the HSE Managers and provided to KSP as required.

Weekly Site Inspections

It is the responsibility of the EPC Contractor's HSE Manager and O&M Contractor's HSE Manager to carry out weekly site inspections. These will be carried out through a weekly site inspection checklist.

The checklists will be used as the primary tool for identifying any non-compliance. The non-compliance procedure will be followed and implemented. Hard copies of the checklists will be printed and completed by the HSE Managers during the inspection of the site.

The inspections will be used to ensure that all parties (including contractor and subcontractors) are fully implementing the management procedures outlined within the EHSS plans.

The information collected during the weekly site inspections will be made available to KSP as required.

Environment, Health and Safety (EHS) Audit

Construction Phase

During construction, KSP will undertake an Environmental, Health and Safety (EHS) audit. The objective will be to ensure EPC Contractor's and subcontractor's compliance with the relevant EHS requirements related to the Project, including in particular the following:

- Environmental and Social Impact Assessment (ESIA) and associated Environmental and Social Management Plan (ESMP)
- IFC 2012 Performance Standards
- World Bank Group (WBG) General EHS Guidelines
- National Tunisian EHS laws, regulations and standards

The EHS audit will be undertaken by the KSP QHSE Manager on a quarterly basis. An EHS audit checklist will be prepared taking into account the following criteria:

- Overall EHS Onsite Management (documentation control, onsite team, training, meetings, inspection, monitoring, reporting, etc.)
- Hazardous material management
- Archaeology and cultural heritage (related to chance find procedures)
- Emergency preparedness and response
- Water management
- Waste management (solid waste, wastewater and hazardous waste)
- Occupational health and safety
- Traffic and transport management
- Air quality and noise

The audit will be based on: (i) site visit and inspections; (ii) EHS documentation review of EPC Contractor and subcontractors; and (iii) meeting/discussions with EPC Contractor's HSE team and subcontractor's team as applicable.

Based on the above, a quarterly EHS audit report will be prepared that will identify: (i) EHS observations and non-conformities; (ii) corrective actions require to resolve observations and non-conformities; (iii) identification of responsible entities for implementation of corrective actions; and (iv) timeline for implementation of corrective actions.

Operation Phase

A similar approach for the operation phase will be undertaken. The EHS audit will be undertaken by KSP QHSE Manager on a quarterly basis on the O&M Contractor for the project.

Human Resources (HR) Audit

Construction Phase

During construction, KSP's Social Specialist, supported by KSP's CLO will undertake a Human Resources (HR) audit. The objective will be to ensure EPC Contractor's and subcontractors' compliance with the relevant HR requirements, labour and working conditions, related to the project to include in particular the following:

- KSP Framework for Labour Management (presented in "Chapter **Erreur ! Source du renvoi introuvable.**")
- Labour and Working Condition Management Plan
- IFC 2012 Performance Standards to include PS 2
- IFC Guidance Notes on PS 2
- National Tunisian EHS laws, regulations and standards related to HR
- International Best Practices

The HR audit will be undertaken by the KSP's Social Specialist and the CLO on a monthly basis and an HR audit checklist will be prepared. The audit will be based on: (i) site visit and inspections; (ii) HR documentation review of EPC Contractor's and subcontractors' (e.g. HR Policy HR Manual, etc.); and (iii) meeting/discussions with EPC Contractors' HSE team and subcontractors' team as applicable.

Based on the above, a monthly HR audit report will be prepared that will identify: (i) HR observations and non-conformities; (ii) corrective actions required to resolve observations and non-conformities; (iii) identification of responsible entities for implementation of corrective actions; and (iv) timeline for implementation of corrective actions.

Operation Phase

A similar approach for the operation phase will be undertaken. The HR audit will be undertaken on a quarterly basis on the O&M Contractor for the project.

EPC Contractor Auditing

Once a week the EPC Contractor shall audit the subcontractor's compliance with the EHSS plans discussed earlier. In that sense, each plan will be audited once every twelve weeks (i.e. 3 months) as a minimum. The subcontractor shall submit an audit schedule to the Project Company.

Based on the above, a monthly audit report will be prepared by the EPC Contractor that will identify: (i) list of plans audited for the month; (ii) observations and non-conformities; (iii) corrective actions required to resolve observations and non-conformities; (iv) identification of responsible entities for implementation of corrective actions; and (v) timeline for implementation of corrective actions.

10 EHSS REPORTING

The following identifies the EHSS reporting that will be undertaken for the Project throughout the construction and operation phase.

Based on the content of the previous chapters, the table below provides a summary of all the EHSS requirements discussed throughout this chapter along with the reporting and record keeping requirements. The table below identifies the requirements for Sponsor, EPC Contractor and O&M Contractor.

The following reports and records will be stored and maintained onsite at all time.

TABLE 4: EHSS REPORTING AND RECORDS

N	SPONSOR		EPC CONTRACTOR		O&M CONTRACTOR	
	EHSS ITEM	REPORT/ RECORD	EHSS ITEM	REPORT/ RECORD	EHSS ITEM	REPORT/ RECORD
1	EHSS Meetings					
1.1	Attend weekly EHSS meetings	N/A	Overall management of weekly EHSS meetings	Minutes of meeting	N/A	N/A
1.2	Overall management of monthly EHSS meetings	N/A	Attend monthly EHSS meetings	Minutes of meeting	Attend monthly EHSS meetings	Minutes of meeting
2	EHSS Training					
2.1	N/A	N/A	Basic Visitor Safety Induction Training for visitors	Signed attendance sheet	Basic Visitor Safety Induction Training for visitors	Signed attendance sheet
2.2	N/A	N/A	General Site Induction Training	Signed attendance sheets	General Site Induction Training	Signed attendance sheets
2.3	N/A	N/A	Emergency Response Training	Signed attendance sheets	Emergency Response Training	Signed attendance sheets
2.4	N/A	N/A	Regular Tool Box Talks	Signed attendance sheets	Regular Tool Box Talks	Signed attendance sheets

N	SPONSOR		EPC CONTRACTOR		O&M CONTRACTOR	
	EHSS ITEM	REPORT/ RECORD	EHSS ITEM	REPORT/ RECORD	EHSS ITEM	REPORT/ RECORD
2.5	N/A	N/A	Other Specialized Trainings (e.g. Occupational Health and Safety)	Signed attendance sheets	Other Specialized Trainings (e.g. Occupational Health and Safety)	Signed attendance sheets
3	EHSS Inspection and Monitoring					
3.1	N/A	N/A	Daily observation	Daily Observation Reports	Daily observations	Daily Observation Reports
3.2	N/A	N/A	Weekly Site Inspections	Weekly site inspection checklists	Weekly Site Inspections	Weekly site inspection checklists

In addition to the above, the below documentation is required to be provided and maintained onsite at all times by the EPC Contractor and O&M Contractor.

REPORTING	ITEMS
Monthly QHSSE Report	<p>Monthly HSE report shall be prepared that should summarize the following:</p> <ul style="list-style-type: none"> Progress in implementing the EHSS Plans as required Findings of the monitoring programs, with emphasis on any breaches of the control standards, action levels or standards of general site management Outstanding incident report forms Relevant changes or possible changes in legislation, regulations and international practices Reporting on Key Performance Indicators (KPI). Number of non-compliances incidences (if any) Number of complaints in relation to any environmental or social grievances (if any) Details of any corrective actions (if any) Results of environmental and social monitoring Quality, Health, Safety, Security and Environmental (QHSSE) statistics
Record Keeping	<p>At a minimum, HSE Manager will ensure that there is a central records store at the office. In addition, electronic copies will also be filed in a suitable location. As a minimum the following records shall be kept:</p> <ul style="list-style-type: none"> Detailed training records of all personnel

	<ul style="list-style-type: none"> ▪ Copies of the site diary and HSE register ▪ Weekly site inspection checklists ▪ Monthly HSE reports ▪ HSE Audit reports ▪ Environmental and social monitoring reports and results ▪ Records specified within HSE management plans ▪ Induction Register ▪ Training attendance register ▪ EHSS meetings register ▪ Grievance forms
Incident Report	<ul style="list-style-type: none"> ▪ Security incident reporting (with corrective actions implemented) ▪ Environment incident reporting (with corrective actions implemented) ▪ Social incident report (with corrective actions implemented) ▪ OHS incident reporting (with corrective actions implemented) ▪ Traffic/transportation incident reporting (with corrective actions implemented)

10.1 EPC Contractor / O&M Contractor Reporting Requirements

The EPC Contractor / O&M Contractor shall undertake the monitoring and reporting activities required in the EHSS and report to the Project Company on a timely manner during the construction and operation phase. Reports are to include details of all EHSS aspects of the project including construction / operation update summary, EHSS issues, mitigation measures implemented, effectiveness of control measures, maintenance of controls, results of monitoring against project criteria, audit results and corrective actions, EHSS induction and training performed in the reporting period, complaints summary and other relevant information in relation to EHSS management and compliance.

The EPC / O&M Contractor will monitor subcontractor performance and consolidate all EHSS information for reporting to the Project Company.

10.1.1 Daily Reporting

- Reporting of unforeseen significant EHSS risks, accidents, emergencies.
- Daily reporting of incidents (near misses and accidents) and EHSS non-compliances
- Daily logging of incidents, EHSS non-compliances, corrective actions, preventative actions, grievances, grievance resolution (with the relevant evidence) and training on the relevant registers, as per the EHSS requirements.

10.1.2 E&S Weekly Reports

The EPC / O&M Contractor will prepare weekly reports with, among others, the following information:

- Overall summary of findings and observations regarding EHSS aspects from walkovers, inspections and audits performed during the week.
- EHSS non-compliances and EHSS risks
- Corrective and preventive measures implemented
- Photographic documentation

10.1.3 E&S Monthly Reports

To be prepared at the end of each month by the EPC /O&M Contractor informing about the implementation of monitoring and reporting activities required in the EHSS and report to the Project Company on a timely manner. The monthly report will include, among others:

- Overall summary of weekly inspections including corrective and preventive measures defined
- Overall summary of monthly audits undertaken on subcontractors
- Update of compliance to project specific obligations
- QHSE statistics
- Significant EHSS issues encountered during walkovers, inspections, and audits and an outline of management response
- Example photographic documentation of inspections, EHSS non-compliances and EHSS risks, corrective measures implemented.
- Trainings performed in the reporting period along with the training material used and sample photographic evidence.
- Permits to Work imparted during the month
- Summary of Key Performance Indicators (KPI) as included within the management plans

10.2 KSP Reporting Requirements

The following sections identify the key reporting requirements undertaken by the Project Company common to overall EHSS management. Each Management Plan includes specific monitoring and reporting requirements that shall also be complied with. This includes the following:

10.2.1 Annual Monitoring Report (AMR)

The AMR will be submitted to the IFI as applicable. The AMR shall include for the reporting year the following: (i) status of EHSS implementation (ii) status of ESAP implementation requirements for the construction and operation phase. The template for the AMR is provided by the IFI.

10.2.2 E&S Monthly Reports

The Project Company HSE Manager will prepare at the end of each month an E&S report that will build on the monthly report submitted by the EPC / O&M Contractor. The monthly report will include, among others:

- Overall summary of incidents encountered

- Overall summary of non-conformities as well as corrective and preventive measures defined
- Summary implementation of each management plan
- Trainings performed in the reporting period
- Summary of stakeholder engagement activities undertaken for the reporting period
- Summary of grievances submitted and their status (both worker and stakeholder)
- Summary of Key Performance Indicators (KPI) for all management plans
- Update of Change Register

10.3 Documentation and Records

The EPC /O&M Contractor will establish and keep records of the activities and related documentation in order to prove its conformity to the EHSS requirements of the plans led by the EPC. The Project Company will centralize the documentation of those plans that implementation is led by the Project Company.

Following documents and records shall be kept by the EPC/O&M Contractor available on site during the construction and operation phase:

- The applicable legal requirements
- Copies of the applicable licenses and permits (construction, environmental, water usage, etc.)
- E&S Policy
- Construction and operation management plans, sub-plans and E&S procedures as identified within this EHSS Manual
- Incidents Reports
- Records of trainings
- Weekly and monthly meeting registers and minutes of meeting record
- Weekly and monthly minutes of meeting record
- Daily site tour inspection reports
- Weekly site inspection reports
- HSE and HR audits
- EHS weekly reports
- EHS monthly reports
- Evidence of implementation of management measures (including but not limited to mitigation and monitoring measures) required in the management plans led by the EPC/O&M contractor or other responsibilities assigned to its contractors
- External and internal communications related to EHSS matters
- Other records as indicated clearly within each management plan as applicable. This could include waste manifests, worker grievance log sheet, chance find procedure reports, etc.

11 CONTRACTOR AND SUBCONTRACTOR/SUPPLIER E&S MANAGEMENT

The ESMS Manual identifies clearly the roles and responsibilities that are expected from the EPC Contractor during the construction phase and O&M Contractor during the operation phase of the Project. This includes in particular the following as a minimum (and to be added based on specific needs identified):

- Prepare, implement and comply with the requirements of the Environmental & Social Management System as identified in "Section 3.4" and "Chapter 5". The required plans of the ESMS must be submitted to KSP for review and approval before commencement of any activities onsite
- Appoint an HSE team headed by an HSE Manager as identified in "Chapter 2"
- Undertake and participate in EHSS meeting and undertake EHSS training and inspection/monitoring requirements as identified in "Chapter 6" – "Chapter 10"

In addition, as discussed in "Section 3.4" earlier, the EPC Contractor and O&M Contractor will ensure that all involved subcontractors and suppliers in the project are provided with the requirements of the ESMS of both KSP and the EPC Contractors/O&M Contractor and they will be required to implement and comply with EHSS requirements accordingly. In specific subcontractors and suppliers will be required to:

- Implement and comply with EHSS requirements and conditions as detailed within the EHSS plans and procedures provided by the EPC Contractor and O&M Contractor as applicable;
- Develop and submit relevant EHSS documents and programs (plans and procedures) where required and as applicable for their scope of work. Such documents must be approved by the EPC Contractor and O&M Contractor; and
- Adhere to all applicable local laws, ordinances, statutes, rules, regulations, and codes governing EHSS as well as international standards.

KSP will ensure that all EHSS requirements are enforced on the EPC Contractor and O&M Contractor through inclusion in contractual obligations. EPC Contractor and O&M Contractor will be required to also ensure that all EHSS requirements are extended and enforced on subcontractors and suppliers through inclusion in contractual obligations as well.

In addition, as discussed earlier in "Chapter 9", KSP will undertake periodic audits to ensure that the EPC Contractor/O&M Contractor and all subcontractors involved in the Project during the construction and operation phase adhere to provisions of the ESMS Manual and Management system and its associated management plans.

Whether through audits or through any other source of information (e.g. grievance mechanism) it comes to the attention of KSP that the EPC Contractor/O&M Contractor or any of the subcontractors or suppliers do not comply with the requirements, the following will apply:

- KSP will issue a non-compliance report which provides details on the non-compliance issue and justification.
- KSP will submit the report and notify the EPC Contractor/O&M Contractor
- KSP will require a corrective action report from the EPC Contractor/O&M Contractor which provides details on the incident, measures taken to rectify the situation and ensure that such an incident does not happen again.
- Depending on the severity of the non-compliance as determined by KSP, a written formal warning could be issued to the EPC Contractor/O&M Contractor.

- Should the non-compliance incident be repeated (and depending on the severity) a similar process to the above will be undertaken and another written formal warning will be issued.
- Should the non-compliance incident be repeated for a third time, discussions will be undertaken between KSP and the Project Manager to impose contractual and financial penalties on the EPC Contractor/O&M Contractor.

11.1 Strategy and Commitment of Local Hiring

Based on currently available information at this stage, the Project will require the following workforce throughout the construction and operation phase:

- Around 450 job opportunities at peak during the construction phase for a duration of approximately 12 months. This will mainly include around 100 skilled job opportunities (to include engineers, technicians, consultants, surveyors, etc.) and 350 unskilled job opportunities (mainly labourers but will also include a number of security personnel).
- Around 45 job opportunities during the operation phase for a duration of 20 years. This will include 10 skilled job opportunities (such as engineers, technicians, administrative employees, etc.) and 35 unskilled job opportunities (such as security staff, drivers, etc.).

Taking the above into account, the Sponsor is committed to ensuring that priority for job opportunities are targeted for local community members to the greatest extent possible throughout the construction and operation phase for skilled and unskilled jobs.

At a later stage, a local recruitment procedure will be developed by the EPC Contractor, under supervision from the Sponsor. The procedure will identify the number of job opportunities targeted for local communities to include skilled and unskilled workers. The recruitment procedure will take into account that the recruitment process will be undertaken, which will be provided with a detailed list of job opportunities along with skills and qualifications required. Based on that, the recruitment procedure will also include a selection process that is fair, transparent and provides equal opportunities for all including females, taking into account the labor management requirements identified in “Chapter o “earlier.

At a later stage, a similar process will also be adopted for the operation phase by the Sponsor and the O&M Contractor that is similar to the above.

12 COMMUNITY SUPPORT INITIATIVES

The Sponsor is committed to implementing community support initiatives which aim to bring an overall positive effect on the local communities, while promoting social welfare. The community support initiative will be guided by the following principles and requirements:

- Community support initiatives selected will be transparent, fair and unbiased, and will comply with all legal requirements
- Community support initiatives selected will be based on sustainable interventions with long-term benefits
- Community support initiatives selected will aim to be practical and tangible to the greatest extent possible having the greatest reachability to local communities
- Sponsor will work in close coordination with both EPC Contractor and the O&M Contractor to leverage the CSR effectiveness.
- Sponsor will undertake consultations with local authorities as applicable to identify projects to be implemented for the community support initiatives taking into account the above conditions (budget, sectors for work, tangibility and practicality, etc.).

Based on the above, Sponsor will prepare an annual Corporate Social Responsibility (CSR) report which will include the following:

- Information on the progress of all ongoing proactive community support activities;
- A list of all known future proactive community support activities;
- An update of the annual budget allocation for community support activities; and
- A yearly action plan.

The CSR report will be published on Sponsor's website to provide a summary of the progress of the community support activities.

14 COMMUNICATION

The Project Company seeks to integrate the commitments made in the E&S Policy through all the levels of the business. To do so, the Project recognises the importance of communicating the relevant ESMS information both internally and externally.

14.1 Internal Communications

The Environmental and Social Policy will be communicated to all Project staff and prominently displayed at the work site and offices.

KSP and the EPC Contractor are responsible to ensure all employees and external parties working for the Project are aware of their duties.

The EPC Contractor HSE Manager are required to communicate to all personnel the Project's E&S commitments and how this ESMS is being implemented, and to communicate all relevant project staff their responsibilities in relation to each specific Management Plan.

Weekly meetings of the ESMS team (including KSP, EPC and subcontractors' E&S staff) will take place during the construction phase of the Project to discuss E&S performance, monitoring activities, incidents and responses.

Other relevant policies, environmental documents and procedures may be communicated through:

- Environmental induction training;
- Regular training and toolbox talks about environmental and social performance and good practices;
- Information on the environmental notice boards at the site office, including specific individuals and their environmental responsibilities, audit timings and summary of findings, description of any incidents, investigations and corrective actions, etc.; and
- Memorandums as a response to deviations and non-conformances, outlining lessons learned.

Employees and subcontractors will also be encouraged to provide feedback on the ESMS and report any environmental and social deviation or incident to senior management through:

- Direct communication with the E&S staff (face-to-face, phone or email);
- Employees suggestion/grievance boxes; and
- Incident/deviation/non-conformance forms.

All personnel are required to communicate potentially unsafe practices/conditions or potential deviations / non-conformances to their supervisor or any members of the ESMS team. Contact names and numbers for key staff will be provided at notice boards in the Project site.

In addition, the grievance mechanism will follow these steps:

- Receive and register internal grievances and requests;
- Screen and assess the importance of the issue raised and determine how to address it;
- Provide, track, document and respond grievances; and
- Adjust the ESMS, when relevant.

In addition to the above, further internal communication and reporting requirements are established in each ESMS Management plan.

14.2 External Communications

External communications include the following main activities:

- Public Disclosure: The Environmental and Social Policy shall be made available to the public at the Project gate and online if the Project Company has a website;
- Communication with third parties working onsite: The KSP QHSE Manager will ensure that external parties working for the Project are aware of their E&S responsibilities;
- Communications related to incidents or emergency episodes: A dedicated emergency communications procedure will be outlined in the Emergency Preparedness and Response Plan to ensure that communications in the event of a crisis or incident are managed correctly;
- On-going Reporting to Affected Stakeholders: The Project will make publicly available information on its ESMS performance. The KSP QHSE Manager will be responsible for the preparation and disclosure of performance reports and disclosure to key stakeholders as per the Stakeholder Engagement Plan;

- External Grievance Mechanism:

The SEP includes an external grievance mechanism to:

- Receive, register and validate external communications and requests for information from the public;
- Screen and assess the importance of the issue raised and determine how to address it;
- Provide, track, document and respond to grievances; and
- Adjust the ESMS, when relevant.

Reporting ESMS performance to the Lenders: The Project will prepare reports to demonstrate compliance with applicable obligations. See Section 14.2 of this document for details on inspections and audits. In addition, there will be reporting to the Lenders as per the specification of the loan agreements.

16 INCIDENTS MANAGEMENT

This section provides the appropriate actions in the event of a reported incident. For the purpose of this section, the following definitions apply:

- Incident: an unplanned event that does not result in personal injury but may result in property damage or is worthy of recording;
- Accident: an unplanned event that results in personal injury or property damage; and
- Near miss: an unplanned event that did not result in injury, illness, or damage, but had the potential to do so.

The Project Company consider incident management as a critical element for two purposes:

- To mitigate its direct consequences (injuries, environmental pollution, damage of equipment, etc.) and indirect consequences (affected client satisfaction, lost time on planning, additional repair costs, lack of confidence, etc.)
- To prevent re-occurrence

This section explains the general requirements for incident management and specificities for near miss, critical accidents and crisis management.

The EPC/O&M Contractor will be required to prepare the following specific procedures accordingly and in accordance with requirements set throughout this section:

- Classification process for incident (e.g. environment, health, etc.)
- Incident Management process to include communications, preliminary assessment, investigation (selection of investigation team, process), Corrective Action Plan, monitoring and reporting and templates as applicable

16.1 Incident report

Incidents can provide valuable information. The implementation of incident investigation procedures should ensure that:

- Investigations are initiated promptly
- Summaries of investigations are included in a report
- Report findings and recommendations are addressed
- Reports are reviewed with staff and contractors

The Project Company considers an incident as an unfortunate event for improvement. Consequently, the reporting of incidents is a strategic tool for steering the EHSS process of the Project. Incident report is to be produced and communicated in case of accident.

a. Verbal Report

All incidents (as defined earlier to include incident, accidents and near misses) must be reported verbally immediately to the Project Company's HSE Manager during construction. It is then the responsibility of the HSE Manager to inform respective groups.

Minor issues will not require a written report and investigation (as detailed below) but still need to be recorded to identify recurrent problems.

b. Written Report

Incident and accidents must have a written report that should be prepared by the EPC/O&M Contractor's HSE Manager. A copy of each completed incident report form will be submitted to the Project Company's HSE Manager and included in the monthly reporting that includes EHS statistics. Near misses will not be reported but only recorded.

Reports should be provided to the Project Company within 24-48 hours from occurrence of the incident.

16.2 Investigation

The investigation of incidents must be performed by the Project Company's HSE Manager or the person he/she designates. However, in case of critical accidents (fatality,) the authorities might decide to conduct the investigation and an internal investigation will also be undertaken by the Project Company.

The investigation aims to collect the maximum of relevant facts in order to ensure a comprehensive analysis of the incident. The key principals for the investigation are:

- It must be thorough and factual
- It must be based on documents, interviews and observations
- It should focus on 4 components:
 - The environment of the incident
 - The methods/procedures/instructions
 - The material and equipment
 - The employee who caused and/or is victim of the incident

The results of the investigation must appear in the Incident Report.

16.3 Analysis

The Project Company shall use one of the following root-cause analysis techniques to identify the direct and the fundamental (root) causes of incidents:

- Fault tree analysis for critical incidents (or near miss with a high potential of severity)
- Any other methodologies able to identify the causes of the incident.

This analysis must be conducted by the Project Company HSE Manager during construction or the person he/she designates with the personnel involved (witness, victim, EPC/O&M Contractor HSE Manager subcontractor HSE officer, subcontractor manager, etc.). The analysis shall also focus on the response so that actions for improvement are identified.

The results of the analysis must appear in the Incident Report. Further to the analysis, corrective measures shall be defined and implemented. These actions shall prevent the reoccurrence of similar incidents as well as incidents with one or more similar causes. Actions for improving the response shall also be defined and implemented.

This return of experience shall be shared internally using the available communication means.

17 MANAGEMENT OF CHANGE

Various changes to this manual and its associated management plans and documentation may be required during the Project in order to address foreseen or unforeseen conditions or situations in a manner that is consistent with KSP's obligations.

During the construction and operation phase, this identified Change Management procedure will be applied to structure the review and approval of identified changes to planned Project arrangements by KSP and, when required, regulatory authorities or Project lenders. This procedure will be applied to allow EHSS issues to be addressed as part of any significant changes to Project procedures, processes, design, or activities.

17.1 Scope of Environmental & Social Management System Changes

Changes may be temporary or permanent, related to Project activities, organization, personnel, EHSS plans and procedures, equipment, materials, health and safety, environmental or community / wider social issues.

Changes may be initiated by KSP, the Owner's Engineer and may also be requested by the EPC Contractor or O&M Contractor. In practice, during the construction and operation phase, the Change Management process is likely to be initiated by KSP or the Owner's Engineer and raised directly with the KSP QHSE Manager.

A Change Request may be generated at any time, for example, during audits, as a result of stakeholder grievances and other complaints, regulatory site visits or interaction with Lenders / Lenders representatives.

The Change Management process will apply when changes occur to any of the following activities or items:

- Alteration of environmental and social impacts management and monitoring measures
- ESHS MS manual, plans, procedures related to the Project
- Personnel changes, training or competency requirements.
- Organisational structure and/or individual EHSS roles and responsibilities
- EHSS protection equipment
- Project designs, re-designs, drawings or engineering processes
- The composition and properties of specified materials, chemicals or fuels
- Introduction of new operating or maintenance procedures or changes to existing procedures

17.2 Management of Change Steps

The process is based on the following key steps:

- Identification of item/situation potentially requiring change;
- Requests for Change Form submitted to KSP QHSE Manager defining:
 - Nature of the item/situation requiring change
 - Any impacts resulting from the change (e.g. safety, pollution, public grievance or other complaint); and
 - Any biophysical, social, economic, or health considerations.
- Once impacts are identified, a review should be made of the ESMP in place at the time of the change in order to assess if the mitigations it includes are sufficient to adequately manage the change and its impacts; if not

sufficient, the ESMP should be modified/expanded to ensure that it can manage the impacts and risks that the change will bring in. If sufficient, then no further actions are required.

- KSP QHSE Manager will review proposed changes for compatibility as applicable:
 - Category 1 changes are approved by the KSP Construction/Operation Manager and KSP QHSE Manager (with additional consultation if required);
 - Category 2 changes are approved by the KSP QHSE Manager (with additional specialist consultation if required) and then submitted to the Construction/Operation Manager for approval;
 - Category 3 changes are agreed between the relevant HSE Officers, the relevant parties/ stakeholders (with additional consultation as required) and are then submitted for approval by the KSP QHSE Manager;
 - Category 4 changes are simply approved by the KSP QHSE Manager or delegated authority.
- Review and approval by external stakeholders if/as required;
- Compliance with reporting and other obligations in the finance documents;
- Application for, and receipt of, any approvals required to implement the change under Tunisian laws and regulations or under permitting conditions;
- Implementation of the approved change, including communication to appropriate parties concerning the nature, scope and timing of the change; and
- Summary of project changes and status to be included in internal compliance reporting and/or in annual monitoring reports or equivalent to the appropriate regulatory authorities and lenders as appropriate.

17.3 Change Categorization

CATEGORY	NATURE OF CHANGE	ACTIONS REQUIRED
1 (Major Change)	<p>Changes which are reasonably likely to result in:</p> <ul style="list-style-type: none"> ■ Significant departure from the Project Description and/or a KSP ESMS Manual and/or a legal / Lender obligation; ■ Significant environmental and/or social impact(s) not identified; ■ Confirmation that a planned mitigation measure for addressing significant environmental and/or social impact(s) are not predicted to be effective; or ■ Material amendment or supplement to the ESMS is necessary 	<p>KSP will notify relevant Tunisian Regulator/Agencies and/ or the Project Lenders within an appropriate timeframe (period as specified in law / the Lenders ESAP or as otherwise agreed).</p> <p>KSP Change Notice will define what change is required, the proposed implementation actions and associated timescale.</p> <p>No changes affecting material environmental and social matters will be implemented without prior Tunisian Agency / Facility Agent/ Lender approval, unless human health or the environment is at imminent risk of serious harm.</p>

<p>2 (Moderate Change)</p>	<p>Changes which are reasonably likely to result in:</p> <ul style="list-style-type: none"> ▪ Departure from the Project Description and/or an KSP ESMS Manual requirement and/or and Tunisian legal / Lender obligation ▪ New environmental and/or social impact(s) not identified ▪ Modification to a planned mitigation measure for addressing environmental and/or social impact(s). 	<p>KSP will notify the relevant Tunisian Agencies and/or the Project Lenders within an appropriate timeframe.</p> <p>If the Lenders consider that a Change should be re-categorized or that the proposed measures for managing or implementing it are inconsistent with the specified E&S Standards, the Lenders through the Facility Agent and or Technical Advisors shall notify the Project Company within a reasonable time period. Thereupon KSP and the Lenders Technical Advisors / Facility Agent will make best endeavours to agree a solution. KSP will not implement the proposed Change until a mutually acceptable is agreed.</p> <p>If the Lenders Technical Advisors/ Facility Agent do not respond within an agreed period, KSP will assume that the proposed change is acceptable and will proceed as per plan</p>
<p>3 (Minor Change)</p>	<p>Changes which do not fall within either of the above Categories 1 or 2, but which need to be notified to Tunisian Regulator / Agency or the Lenders.</p>	<p>KSP will notify the relevant Tunisian Agencies/ Stakeholders either in routine meetings or formal reports as appropriate. KSP will notify the any changes made during the course of the year in its Annual Monitoring Report or equivalent mechanism.</p>
<p>4 (Negligible Change)</p>	<p>Other non-material changes</p>	<p>No notifications needed</p>

18 CONTROL OF RECORDS

The EPC Contractor is required to maintain and archive records that demonstrate ESMS performance and conformity/compliance to the national, international and ESMS requirements.

The following documents to be kept are the following:

- Reports of internal audits and reports of third parties' audits, as well as the detected non-conformities and associated Corrective/Preventive Actions forms,
- Records of incidents reporting and investigations,
- Reports of the monitoring and measurement activities,
- Records of grievances,
- Communication material addressed to Stakeholders,
- Communication to and from the authorities,
- Records of Stakeholder engagement activities,
- Minutes of the Management Review meetings,
- Any other relevant document demonstrating the ESMS performance.

EPC Contractor must also report the following to KSP:

- Monitoring results,
- Inspection results, audits and assessment results,
- Monthly HSE reports,
- QHSE Statistics,
- Incidents reports,
- Other forms and reports required in the ESMP.

19 CONCLUSIONS

The Environmental and Social Management System Manual described in this document is designed to act as a framework for which all members of KSP are expected to adhere to regarding the environmental and social commitments of KSP. It is not meant to be a prescriptive document that implements a one-size fits all approach due to the complex nature of the work the Project Company's work, but instead provides a framework that will be followed by the EPC Contractor.

Therefore, while this ESMS Manual outlines the requirements and minimum standards expected across the board, this Manual must not be read as a literal document devoid of possible adaption based on the details that will be provided by the EPC Contractor in their ESMS Manual. Instead, this ESMS should be read as a list of checks and balances that must be implemented across KSP working environment in a way that works best for the given situation.

Throughout this ESMS Manual, KSP has shown direct compliance with the Lenders Standards. Indeed, the Project Company intends to have effective E&S processes and procedures in place which allows for continual improvement in its ESMS performance year-by-year, and ensures that the Project Company is able to anticipate changes in the future through an ongoing process of planning, doing, checking, and reviewing.

In addition, the various policies, management plans, procedures and mechanisms that will be prepared and implemented by the EPC Contractor will show that the Project can successfully:

- Uphold compliance with this ESMS Manual, Lenders Standards and National laws and regulations and avoid legal violations;
- Ensure all activities and persons responsible anticipate and take action to avoid, as far as possible, adverse impacts or risks to workers, communities and the environment;
- Identify and thoroughly assess known and potential ESMS risks and adverse impacts, as well as opportunities for positive ESMS impacts, throughout the lifecycle of operations;
- Ensure that affected workers, communities and other stakeholders are engaged on issues that could potentially affect them in order to gain positive support from these stakeholders, address feedback, appropriately address claims/grievances and anticipate and avoid social conflict; and
- Promote and provide means for adequate engagement with affected communities throughout the lifecycle of activities and sites (including the land acquisition/lease, development, operation and exit) on issues that could potentially affect them, and to ensure that relevant ESMS information is disclosed and disseminated.

ANNEX 1

List of KSP Policies and Internal Procedures:

- KSP Occupational H&S Policy;
- KSP Environmental Policy;
- KSP Human Resources Policy;
- KSP Grievance Mechanisms;
- KSP Stakeholder Engagement Plan;
- KSP Security Policy;
- KSP Risk Assessment Procedure;
- KSP Risk Assessment;
- KSP Labour Recruitment Procedure;
- KSP Worker Code of Conduct;
- KSP QHSE Employer Requirements.