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<b>Standard Title</b>	Contractor and Sub-contractor Management Plan	<b>Date of Issue</b>	October 4, 2023
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<b>Approved by</b>	Catherine Garcia	<b>Role</b>	ES Group Head
<b>Signature</b>			

## 1 INTRODUCTION

Energopro Group (EP Group) relies on contractors and sub-contractors to implement a number of activities. The manner in which these contractors and sub-contractors perform their work impacts on the reputation of EP Group, the environment, the communities in which we work (Affected Communities), and the safety and working conditions of our workers and the workers of our contractors and sub-contractors.

## 2 OBJECTIVE

The purpose of this document is to ensure our contractors and sub-contractors comply with our environmental, social, health and safety (ESHS) requirements. By doing this we aim to develop constructive partnerships with our contractors and their workers.

The general objectives of this plan are:

- Improve our environmental, social, and health & safety performance.
- Manage the performance of our contractors and sub-contractors in a way that is aligned with our Code of Conduct, policies, standards, plans (including this management plan) and procedures in force from time to time (the Relevant Standards).
- Ensure the safety of all workers, visitors, and affected communities.
- Manage environmental, social and health & safety risks.
- Comply with the national and EU regulatory environment, World Bank Group, and the International Finance Corporation (IFC) Sustainability Policy and Performance Standards.

## 3 SCOPE

This management plan applies to all Business Units during the design, mobilization, construction, demobilization, and operations phase for the entire EP Group. This document complies with IFC's Sustainability Policy and Performance Standards, in particular Performance Standard #1 – Assessment and Management of Environmental and Social Risks and Impacts.

## 4 ABBREVIATIONS AND DEFINITIONS

<b>Abbreviation</b>	<b>Description</b>
EP	Energopro
NVALMP	Noise, Vibration, and Ambient Light Management Plan
BU	Business unit
CEO	Chief Executive Officer
ESG	Environment, Social, Governance
BoD	Board of Directors

CSRD	Corporate Sustainability Reporting Directive
ESRS	European Sustainability Reporting Standards
GRI	Global Reporting Initiative
IFC	International Finance Corporation
NEC	National Electrical Code
GIIP	Good International Industry Practice
SQM	Sky Quality Meters
WHO	World Health Organization

## 5 RESPONSIBILITIES

Energo-Pro takes its duty of care and corporate responsibility seriously. Business Units (BUs) are responsible that suitably qualified personnel are available to implement and comply with the NVALMP. In general, the responsibility for compliance with this corporate Noise, Vibration, and Ambient Light Management Plan and the cited requirements lie with the Environment Department (asset and BU level), consisting of the Environmental Engineer. The overall responsibility for compliance with the relevant standards lies with the highest-level executive of the business unit, the CEO.

The implementation and compliance with the NVALMP necessitates a clear delineation of responsibilities across various organizational levels. Here is a breakdown of the key responsibilities:

### i) Environmental Manager or equivalent (asset-level):

- **Implementation and Monitoring:** Based on this corporate NVALMP, the environmental manager must develop the Noise, Vibration, and Ambient Light measures at asset-level which includes identifying the local legal and reporting requirements. Moreover, the Environmental Manager has the general responsibility for the implementation of the asset and corporate NVALMP.
- In addition, the environmental manager is responsible for monitoring all relevant noise and vibration-related data including regular collection, and reporting of performance metrics to the BU ESG focal point and local authorities to ensure compliance with regulatory requirements.

### ii) Business Units (BUs):

- **ESG focal point BU:**
  - **Analysis:** The primary responsibility of the ESG Focal Point is to ensure that the BU is in compliance with regulatory requirements and to analyze and review the asset-level data collected.
  - **Compliance:** ESG Focal Points ensures the BU compliance with this Noise, Vibration and Ambient Light Management Plan and drives all ESG matter at the BU level.
- **Contractor Manager or equivalent:**
  - **Review:** Noise, vibration, and ambient light management contractors are assessed and evaluated as part of the procurement process prior to approval

### iii) Corporate

- **ESG Group Head:**
  - **Guidance:** The EP Group Head provides technical guidance to the Business Unit as well as guidance on improvements.

- **Review:** Review and verification of the asset-level Noise, Vibration and Ambient Light Management Procedures.
- **ESMS:** ES Group Head updates the ESMS and related plans and procedures.
- **ESG Committee (corporate)**
  - **Strategy and Review:** The ESG Committee sets the strategic direction for noise, vibration, and ambient light management and is responsible for the corporate NVALMP which includes a regular review of the corporate requirements and processes.
- **Highest-Level Executive of the Business Unit:**
  - **Overall Responsibility:** The Board of Directors (BoD) of the Business Unit holds the ultimate responsibility for compliance with the Relevant Standards. This includes ensuring that the necessary resources, budget and support are provided to meet environmental objectives and that compliance is achieved across all operations.
  - **Overall Accountability:** The Group BoD is ultimately accountable for ensuring the ESMS to be compliant with international best practice standards (such as IFC, see chapter 2)

## 6 ENERGO-PRO POLICIES, STRATEGIES, STANDARDS AND PLANS

EP Group is committed to long-term ESHS performance management. We recognize that our supply chain plays an integral part in our ESHS performance. The following six principles have been developed to ensure contractor compliance will be achieved:

- A contractor pre-qualification process. Prior to selecting a contractor, EP Group will conduct a review of the contractor as per EP Group Supplier Management Procedure (as referred to below).
- Contracts (including, e.g., contracts incorporating our General Terms and Conditions) requiring compliance with the Relevant Standards. Making these documents integral part of the contract will allow us to manage the ESHS performance of contractors and sub-contractors.
- Amending existing contracts based on pre-determined amendment criteria.
- Group's General Terms and Conditions, including ESHS clauses.
- Induction of Relevant Standards and Site inductions.
- Monitoring of contractors during the contractual period.

The following documents have been prepared and/or are in the process of preparation to manage risks. Compliance will be achieved progressively; i) immediate compliance with existing standards, through the new contract specifications and monitoring; ii) amendment of

existing contracts, we expect this to be completed by Q2 2024; iii) compliance by Q4 2024 of all standards once the rollout and training of the new standards have been completed.

- Code of Conduct

### **Policies**

- Sustainability Policy
- ESG Policy
- Human Resource Policy
- External Data Protection Policy
- Health and Safety Policy
- Human Rights Policy
- Procurement Policy
- Anti-Bribery & Anti-Money Laundering Policy
- Security Policy
- Whistleblower Policy
- Land Acquisition Policy (2024)

### **Strategies**

- Sustainability Strategy
- Climate Change Strategy

### **Standards**

- Stakeholder Engagement Standard
- Grievance Mechanism Standard (internal and external)

### **Plans and Procedures**

- Climate Change Adaptation Action Plan
- Climate Change Plan
- Occupational Health and Safety Management Plan (2024)
- Environmental Monitoring Plan (2024)
- Air Quality and Dust Management Plan (2024)
- Wastewater Management Plan (2024)
- Erosion Prevention and Sediment Control Plan (2024)
- Heritage Resources Chance Finds Procedure (2024)
- Noise, Vibration, and Ambient Light Management Plan (2024)
- Waste Management Plan (2024)
- Spill Management Plan (2024)
- PCB Removal Plan (2024)
- Biodiversity Management and Monitoring Plan (2024)
- Emergency Preparedness and Response Plan (2024)
- Traffic and Access Management Plan (2024)
- Worker Transportation Plan (2024)
- NFPA Implementation Plan (Requirements for contractors) 2024 – Applicable for contractors working with electricity related assignments.
- Supplier Management Procedure

## **1. Regulatory Framework and Good International Industry Practices**

- EU legislation taking the form of i) treaties establishing the European Union and governing the way it works; and ii) applicable EU regulation, directives and decisions including the European Green Deal, EU Taxonomy Regulation, the Corporate Sustainability Reporting Directive (CSRD), and the European Sustainability Reporting Standards (ESRS).
- Applicable National legislation on environmental and social regulation.
- World Bank Group: 1) the World Bank Group Environmental, Health, and Safety General Guidelines (April 30, 2007); and 2) the World Bank Group Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution (April 30, 2007).
- International Finance Corporation Policy on Environmental and Social Sustainability and Performance Standards:

**Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts.** The objectives of this PS are i) Identify project E&S risks and impacts; ii) Adopt mitigation hierarchy; iii) Improve performance through an Environmental and Social Management System; iii) Engagement with Affected Communities and other stakeholders throughout project cycle and it includes communications and grievance mechanisms.

**Performance Standard 2: Labor and working conditions.** The objectives are to i) Promote the fair treatment, non discrimination, and equal opportunity of workers; ii) Protect workers, including children, migrant workers, workers engaged by third parties, and workers in the client's supply chain; iii) Promote safe and healthy working conditions; and iv) Avoid the use of force labor.

**Performance Standard 3: Resource efficiency and pollution prevention.** The objectives are to i) Avoid, minimize, and reduce project related pollution; ii) Energy efficiency and more sustainable use of resources, including energy and water; and iii) Reduced project related Greenhouse Gas (GHG) emissions.

**Performance Standard 4: Community health, safety, and security.** The objectives are i) To anticipate and avoid adverse impacts on the health and safety of the Affected Community; and ii) To safeguard personnel and property in accordance with relevant human rights principles.

**Performance Standard 5: Land acquisition and involuntary resettlement.** The objectives are i) Avoid/minimize adverse social and economic impacts from land acquisition or restrictions on land use including to avoid, minimize displacement, alternative project designs, and avoid forced evictions; ii) Improve or restore livelihoods and standards of living; iii) Improve living conditions among displaced persons by providing adequate housing and security of tenure.

**Performance Standard 6: Biodiversity conservation and sustainable management of living natural resources.** The objectives are i) Protection and conservation of biodiversity; ii) Maintenance of benefits from ecosystem services; iii) Promotion of sustainable management of living natural resources; and iv) Integration of conservation needs and development priorities.

**Performance Standard 7: Indigenous Peoples.** The objectives include: i) Ensure full respect for IPs such as human rights, dignity, aspirations, livelihoods, and culture, knowledge, practices; ii) Avoid/minimize adverse impacts; iii) sustainable and culturally

appropriate development, benefits, and opportunities; and iv) Free, Prior, and Informed Consent (FPIC) in certain circumstances.

**Performance Standard 8: Cultural heritage.** The objectives are: i) Protection and preservation of cultural heritage; and ii) Promotion of equitable sharing of cultural heritage benefits.

## 7 RESPONSIBILITIES

Business Units (BUs) are responsible for ensuring contractors and sub-contractors comply with this plan. The overall accountability of compliance with the Relevant Standards lies with the highest-level executive of the Business Unit, the CEO.

BUs will appoint:

- A senior suitably qualified manager<sup>1</sup> (the Contractor Manager). This person will be responsible for ensuring that the Contractor and Sub-contractor meet the requirements of this plan, including the provision of all relevant information, reporting, training, supervision required to perform their work safely, and manage environmental and social impacts. In addition, the Contractor Manager is responsible for ensuring that contractors and sub-contractors' staff have received the Relevant Standards and Site Inductions and that they are well understood. Depending on the duration of the contract and impacts, the Contractor Manager shall prepare regular update monitoring reports, with the support of related departments, to inform the BU BOD about progress and compliance with the Relevant Standards. The Contractor Manager will ensure that contractors provide the sub-contractors with the relevant requirements.
- Depending on the Scope of Work different BU departmental specialists will be required to monitor non-technical components of the contractor's performance. This could include:
  1. Environmental staff to monitor and inspect compliance with the standards, including waste management, hazardous products, and environmental footprint of the Scope of Work.
  2. Health and safety staff to monitor and inspect compliance with health and safety standards, including workers' accommodation.
  3. Human resources staff to review data regarding rights of personnel, ensure there are no Human Rights violations and alignment with the Human Resources Policy.
  4. Community staff to monitor grievances received by the contractor and other related community issues/impacts included in the Scope of Work.

Contractors and Sub-contractors will appoint a contractor representative to act as a point of contact for compliance with this plan. Depending on the ESHS impacts and risks, contractors and sub-contractors will appoint qualified ESHS personnel to oversee ESHS performance.

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<sup>1</sup> Generally, the contractor manager is the main person responsible for the preparation of the Scope of Work and overseeing all the different components of the scope of the contract, for example for a construction contract the responsible Contractor Manager would be the Construction Manager or Director.



## 8 REQUIREMENTS

This section describes the minimum requirements associated with the management of contractors and sub-contractors during the performance of their duties. Specific Environmental, Social, Health and Safety (ESHS) plans are in the process of preparation and will be completed and rolled out by Q3 2024. This section of this plan will be updated upon completion of the plans and procedures listed under section 4.

### 8.1 General Requirements

- Business units will ensure that the requirements of this plan are communicated to contractors and sub-contractors and are complied with.
- Contractors will appoint a company representative contact person; this person will report all work activities related to the contract to the Contractor Manager
- Contractors are responsible for ensuring that their contractors (i.e., EP Group Sub-contractors) comply with the Relevant Standards. Furthermore, contractors are required to monitor their own ESHS performance and the performance of their contractors.
- A Description of all equipment, products and supplies that will be used to fulfill the contract will be provided.
- A list of personnel assigned to the contract, including role, residence, age, and gender, processed in full compliance with national applicable protection laws will be provided.
- Certification of personnel, if applicable.
- Management of waste generated by contractors and sub-contractors.
- Description of contractor and sub-contractor accommodation that will be provided to staff, if applicable.
- Contractors will ensure the use of necessary PPE, provide training, and consistently enforce the use of PPE.
- The Contractor Manager will ensure that upon completion of the contract, all sites are cleaned, cleared and free from hazards and if applicable, restored. A final walk through will be conducted upon demobilisation by the Contractor Manager and applicable staff.
- Business Units constructing large projects classified as IFC Category A (or equivalent) will prepare project specific Contractor ESHS Management Plans in compliance with this plan and the approved Environmental and Social Impact Assessment (ESIA). IFC classified Category B projects (or equivalent) might also be required to prepare project specific Contractors ESHS Management Plans, depending on the scale of impacts and risks.
- Contractors and sub-contractors shall be required to consider maximizing community benefits by employing and purchasing goods from the local communities and region.
- Contractors and sub-contractors are required to communicate any penalty received by them or by an external party during the course of the implementation of the scope of work.

### 8.2 Inductions and Training

The following inductions and training will be provided:

- Inductions for a contractor and sub-contractor staff regarding the Relevant Standards.
- Site inductions.
- All contractors and sub-contractors must have specialized training relevant for the duties that they will perform.
- Emergency Response Training.

- Pre task risk assessment

### **8.3 Equipment, Materials and Products**

- Contractors and sub-contractors will ensure that equipment and tools used to fulfill the contract are in good working conditions, appropriate for the task and do not pose a risk for the environment and people and/or hazards have been properly identified and managed.
- Equipment and tools will be regularly inspected to ensure they comply with manufacturer's instructions.
- Operations instructions for equipment and tools are readily available.
- Adequate PPE is available for staff.
- Approval of hazardous products will be given by the Contractor Manager prior to bringing any hazardous products onto an EP Group site.
- Products requiring a material safety data sheet (MSDS) will be stored according to manufacturer description and the MSDS will be displayed.
- The Contractor Manager will perform regular checks to ensure equipment, tools, and products to not introduce additional hazards or hazards are adequately managed.
- Contractor and sub-contractors will ensure that management controls are in place to ensure that wastes, including hazardous products are stored, transported, and disposed of in accordance with EP's Group Waste Management Plan (to be developed in 2024),
- All equipment, materials and products will be removed from site after completion of the works, unless stipulated differently in the contract.

### **8.4 Work Permits**

- The Contractor Manager will ensure that Permits to Work are issued to contractors undertaking high risk activities or working in areas which are considered ecologically and/or socially sensitive.
- Permits to Work will be issued by competent EP Group personnel, depending on the risk, health, and safety, environmental, social, and other. The Permit to Work will identify the risk and control measures established to manage the risk, duration of the activity, name of personnel assigned to the task, equipment, PPE, and other relevant information.

### **8.5 Grievance Management**

- Contractors and sub-contractors will communicate all external grievances to the Contractor Manager.
- Contractors and sub-contractors will ensure that an internal Grievance Management Procedure for all contractor and sub-contractor workers is available and communicated. If contractors and sub-contractors do not have this document, they are required to use the EP Group Business Unit Grievance Mechanism Procedure. Prior to engagement, the contractor will inform the Contractor Manager whether they will be using their own procedure or the EP Business Unit Procedure.

### **8.6 ESHS Management System**

Contractor and sub-contractor will have in place an ESHS Management System compliant with the Relevant Standards and appropriate to the impacts and risks of the scope of work. Alternatively, contractors and sub-contractors will use the ESHS Management System of EP Group Business Units.

Depending on the impacts and risks and the scope of work of the activities, contractors will be required to provide specific ESHS plans and other associated documentation. These documents will be submitted to the Contractor Manager by the contractor for review and approval.

### **8.7 Incident, Near Misses and NCRs Reporting**

- Incidents will be classified based on type of incident, health and safety, community, environmental and security. All incidents will be registered in an incident log. In addition, incidents are tracked through an incident log. The log will include date and type of incident, location, description of the incident, root cause analysis, control measures, status of the implementation of the control measures, date of completion.
- NCRs detected during inspections carried out by EP Group will be treated according to the seriousness of the situation. A non-conformity log will be maintained noting the type of non-conformity and the actions to be taken to close the non-conformity. All Near Misses will be documented in a log.
- Respond to Significant E&S Events as described below. A Significant E&S Event means any significant social, labor, health and safety, security or environmental incident, accident or circumstance having, or that could reasonably be expected to have, a material adverse effect or material adverse impact, including, without limitation explosions, spills that result in material pollution, any workplace accidents that result in death or lost-time of greater than one week, or any work stoppage as a result of labor unrest, community unrest, or security incidents.
- Communication of Significant E&S Events: contractor will notify the Contractor Manager immediately, and in no event later than eighteen (18) hours after occurrence; (ii) submit to the Contractor Manager within twenty-five (25) days after the occurrence of such event a more detailed summary report that includes a description of the relevant Significant E&S Event, the root cause analysis of the incident, the measures being taken or has taken to address such event, and its plans to prevent any future similar event; and (iii) keep the Contractor Manager informed of the on-going implementation of such measures and plans within the scope of the duration of the contract and/or the closure of the incident.

## **9 COMPLIANCE MONITORING**

Contractor and sub-contractor activities and performance will be regularly monitored to ensure contractors and sub-contractors are working in compliance with this plan and in accordance with the scope of work. Business Units will assign suitably qualified staff to monitor contractors and sub-contractors. Monitoring will include:

- Scheduled inspections and/or audits.
- Unscheduled inspections.
- Documentation review of ESHS records.
- Regular ESHS reporting, including environmental parameters, if relevant, such as noise, air emissions, GHGs emissions, water quantity and quality, waste generation and other.
- Reporting of ESHS incidents, near misses and NCRs.
- Regular meetings with Contractors and Sub-contractors to discuss progress and any ESHS incident or issue. The meetings will be headed by the Contractor Manager and if relevant EP Health and Safety, Environmental, Human Resources and Social Staff.

Any issues identified during the inspections and/or audits will be documented, and closure of the issues identified will be discussed with the contractors and will be recorded with an adequate completion date.

## 10 DISTRIBUTION

This document is incorporated in Contractor and Sub-contractor package of terms and conditions. The plan will be updated upon completion of the plans and procedures mentioned in section 4 of this document.

## 11 ENTRY INTO FORCE

This document enters into force and is effective on and from 1 December 2023.