

Environmental and Social Action Plan (ESAP), 30.11.2022:

#	Task/measure/corrective action	Purpose of action	Source of requirement	Responsibility	Measure of success	Deadline	Status
IFC PS1: Assessment and Management of Environmental and Social Risks and Impacts							
1.1	Submit report to the Lenders in accordance with requirements set out within the Environmental and Social Management Plan (ESMP) on environmental, social, health and safety (ESHS) performance and including status of each ESAP element and current status of ESHS issues	To ensure measures within the ESIA and EIA are being implemented	IFC PS1	Ivicom Energy	Submission of report on specified schedule	Quarterly reports to be submitted during construction Six-months reports during operation	Established quarterly reporting system.
1.2	Appoint and maintain suitably qualified and experienced person(s) to be responsible for environmental, social, and occupational health and safety (OHS) for the Project.	To ensure that suitably qualified and experienced ESHS staff are working on the Project and are accountable to Project management.	IFC PS1	Ivicom Energy	Appointment of ESHS personnel	Prior to construction Maintain during construction and operation	Completed. Company HSE Group from Belgrade was hired.
1.3	Produce an ESMP for construction (C-ESMP) and operation (O-ESMP) for the implementation of the management and mitigation measures listed in Appendix ESIA Vol. II (Dec. 2017; Mott MacDonald) and Environmental Impact Assessment (2021, ECOlogica Urbo). Include an organization chart, which shows the organizational structure of the project management team hierarchy and defines all key management roles, including the ESHS plan (C-ESMP) and related sub-plans and monitors the compliance of construction subcontractors. Update the ESMP with any additional mitigation as needed as the project progresses.	Ensure environmental and social management measures prescribed within the ESIA are implemented	IFC PS1 Best practice	TSA/TIA/MSA, BoP and CW Contractor	C-ESMP produced	Prior to main construction activities Update the ESMP where necessary	Completed. All Contractors have prepared documents entitled Elaborate on Construction Site Development, which contain the required elements.

	Ensure that the engineering, procurement and construction (EPC) contractor develops environmental and social management in construction					Monitoring compliance with the EPC throughout the project life cycle	All contractors are familiar with ESAP and SEP requirements. The quarterly reports contain information on monitoring compliance with the EPC requirements of the C-ESMP.
1.4	Develop, maintain and continuously improve the Environmental, Health and Safety Management System (EHSMS) in accordance with international standards, i.e. ISO 9001 (quality management systems), ISO 14001 (environmental) and ISO 45001 (health and safety)	Promote EHS culture within the organisation and meet international best practice Documentation of roles and responsibilities within Ivicom Energy	IFC PS1 Best practice	Ivicom Energy	Evidence of ISO accreditation	During the duration of the project The next recertification should start on: 22.4.2023 for ISO 45001 25. 5. 2023 for ISO 9001 for ISO 14001	The management system is still valid.
1.5	Include contractual clauses within the contractors' agreement that contractually requires compliance with international requirements and with the requirements of the ESMP/ESAP.	Ensure a unified adoption of international environmental, health, safety and social standards by all parties involved in the Project	IFC PSs Best practice	Ivicom Holding	Evidence of international environmental, health, safety and social contractual obligations within EPC/EPCM contractor contract	Ongoing from commencement of construction	Completed. These provisions are included in contracts with all contractors.
1.6	Conduct quarterly weekly inspections of construction site and EPC/EPCM contractor's occupational health and safety (OHS) performance. Report on performance to Lenders every three months during construction. Report frequency to be increased in the event of significant issues/incidents on site.	Ensure EPC/EPCM contractor's adoption of international requirements for OHS	IFC PS1	Ivicom Holding	Throughout construction	Report available and submitted to Lenders weekly/quarterly	Daily, weekly and monthly reports are available.

1.7	Update C-ESMP for operations (O-ESMP) and decommissioning (D-ESMP), including revision of sub-plans where necessary	To ensure that plans are appropriate to the current phase of the Project	IFC PS1	Ivicom Energy	O-ESMP and sub plans D-ESMP and sub plans	Prior to each change in project phase	
1.8	<p>Publish the Project SEP on the Ivicom Energy website. Update regularly and implement the stakeholder engagement plan (SEP), including Project performance grievance mechanism.</p> <p>As part of the SEP, maintain a register of external communications including minutes of meetings held with stakeholders (including, among others, local municipalities, national park administration, hunting associations). Separate meetings with each of the interested parties are held at least once every six months.</p> <p>Publish annual reports of key environmental and social aspects of the Project (see 1.10 below).</p>	To maintain good stakeholder engagement and framework for sharing information with the public	IFC PS1	Ivicom Energy	<p>SEP published and regularly updated</p> <p>Report to Lenders on consultation activities</p> <p>Six-months report to Lenders on all grievances received and how these were resolved</p>	Throughout Project lifecycle	<p>SEP publicly announced.</p> <p>Grievance mechanism has been implemented. Grievances are recorded and resolved.</p> <p>Regular meetings are held with representatives of local residents, local governments and organizations. Reports of these meetings are posted on the website.</p>
1.9	<p>Develop and implement contractor/subcontractor Management Plan to manage ESHS planning and performance of construction and other contractors, including at a minimum:</p> <ul style="list-style-type: none"> • Inclusion of relevant ESAP requirements in contracts/subcontracts. • Clear assignment of Ivicom and contractor ESHS responsibilities. <p>Contractor reports to include relevant data in reports to Lenders, and to allow evaluation of need for corrective actions.</p> <p>Verification of training and/or proper credentials for contractor staff/managers responsible for ESHS</p>	ESHS management of contractors and subcontractors	IFC PS1	Ivicom Holding TSA/TIA/MSA, BoP and CW Contractors	<p>Development and implementation of contractor management system</p> <p>ESHS reports to lenders on contractors' oversight</p>	Ongoing from commencement of construction	<p>Completed.</p> <p>The project company has established and implements plans of preventive measures, the content of which corresponds to the requirements of this criterion.</p>
1.10	<p>Publish the Non-Technical Summary (NTS) of the ESIA addendum on the Ivicom Energy website.</p> <p>Make hard copies of documents available in Ivicom offices and municipal offices.</p> <p>Update and re-update NTS when relevant</p>	To inform the public on foreseen impacts and planned mitigation measures	IFC PS1	Ivicom Energy	NTS published, hard copies available	<p>Prior to construction</p> <p>Maintain during construction and operation</p>	<p>Completed.</p> <p>To be implemented.</p>

1.11	Update the Ivicom Energy website with current information about the Project (in English and Serbian)	To inform the public on foreseen impacts and planned mitigation measures	IFC PS 1	Ivicom Energy	Current information about the project is available in English and Serbian on the Ivicom Energy website	Before signing Maintain during construction and operation	
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IFC PS2: Labour Working Conditions

2.1	Monitor contractor and supplier performance in management of recruitment and labour issues, including management of worker grievances	Prevent worker grievances	IFC PS2 Best practice	Ivicom Energy	Limited number of labour grievances which are quickly resolved	Ongoing from commencement of preparation for construction	Grievance mechanism is in operation. The project company hired two legal entities that monitor this aspect (EcoLogica Urbo and HSE Group).
2.2	Develop and implement an OHS plan(s) to guide all activities on project site during site preparation, construction, and operation and ensure that all contractors adopt these plans. Requirements to include, at a minimum: <ul style="list-style-type: none"> • Job and task-specific hazard analysis and controls for all activities • Provision of personal protection equipment (PPE), requirements for use of PPE, and enforcement of PPE use • Safety training for all personnel in their language, covering hazards and safety protocols of their jobs • Special training for specific hazards: working at heights, in excavations, with electricity • Review and approval of contractors' OHS plans • Oversight of contractor OHS implementation, including mandatory reporting • Recording incident statistics, including total work hours, lost time incidents, major injuries, fatalities, etc. 	Promote OHS and prevent any incidents	IFC PS2 Best practice	Ivicom Energy Contractors	OHS plans developed Zero incidents	Ongoing from commencement of preparation for construction	Plans of preventive measures have been prepared for each of the facilities that make up the WF "Krivača".

IFC PS3: Resource Efficiency and Pollution Prevention

<p>3.1</p> <ul style="list-style-type: none"> • Integrate and maintain mitigation measures associated with pollution prevention identified in the ESMP into the C-ESMP. This should include as a minimum: <ul style="list-style-type: none"> – Maintain equipment and take other measures to keep noise to a minimum, including avoiding/minimizing use of equipment at night. Monitor for noise at receptor locations upon request by affected people. Implement appropriate mitigation if noise exceeds applicable standards. – Develop and implement construction phase dust suppression plan to ensure dusty loads are sheeted and unsealed roads are damped-down. – Develop and implement waste and hazardous materials management plans for construction and operation phases, to cover all liquid and solid wastes and materials (chemicals, fuel, construction debris, excess spoil, domestic/household wastes, spill cleanup debris, etc.). Maximize waste reduction, reuse, recycling, etc. The disposal of municipal and construction waste and all other forms of organic waste in the area of the wind park is prohibited. • Earthen material management measures: <ul style="list-style-type: none"> • Segregate and store in stable piles all topsoil and subsoil salvaged from construction areas. • Store rock in stable piles. • Protect all storage piles with covers, including vegetative cover (native grass species) as needed to prevent wind/water erosion and desiccation. • Use best practices to prevent or retard run-off. • Reinstate all disturbed areas by covering with topsoil and seeding/planting with native species, or returning to tillage. 	<p>Promote EHS culture within the organisation and meet international best practice.</p>	<p>IFC PS3 Best practice.</p>	<p>Ivicom Energy Contractors</p>	<p>Development of C-ESMP</p> <p>No environmental incidents. In case of incidents, imminent remedy and respective report produced</p>	<p>Prior to and throughout construction</p>	<p>Constant presence of Engineers, experts in environmental protection, social relations and health and safety, who monitor whether the contractor's activities comply with this requirement.</p>
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PS4: Community Health, Safety and Security

4.1	<p>Implement safe practices through the C-ESMP during construction to minimize potential impacts to local communities during construction as specified within the ESMP</p> <p>Plans and procedures to include, as a minimum:</p> <ul style="list-style-type: none"> • Traffic management plan includes among others: <ul style="list-style-type: none"> • defining the movement of heavy goods vehicles, the number of trips in both directions and the most acceptable transport routes to the locations of the planned wind turbines; • defining roads that connect zones with works and zones with parts and equipment; • speed limits and prevention of dust emissions from roads; • for transportation, use only the roads that are defined by planning and project documentation for access to the subject zone and locations. • Public notices of hazards associated with works and equipment during construction and operation. • Emergency preparedness and response plan. • Security measures to prevent unauthorized access during construction and minimize access to substation and turbine interiors during operation. • Develop and implement traffic and transport management plan(s) to include access, routing, diversions, exceptional loads, and driver training. Consult with local stakeholders and provide timely information to users of land of times access to their land may be necessary, or limited. Contracts must ensure compliance with plan(s). Plans must cover transport of turbines, rock/stone, and other materials to be brought to or removed from the site. • During construction and operation, monitor noise at residences upon request and take actions to reduce or control noise as needed to meet applicable standards. Ensure proper noise controls on vehicles and equipment. When designing the substation, use technology whose specifications ensure that noise standards will not be exceeded. 	<p>Promote good practice during construction and to protect the health and safety of local communities.</p>	<p>IFC PS4 Best practice</p>	<p>Ivicom Energy Contractors</p>	<p>Development of C-ESMP</p> <p>In case of community grievances/ complaints, imminent reaction towards the remedy, followed by the respective report(s)</p>	<p>Throughout construction</p>	<p>Regular meetings are organized with the local population in order to inform the local population and organizations about activities on the construction site that may have an impact on the functioning of individuals, households and organizations of the local community as a whole. The reports from those meetings are publicly published on the website of the project company.</p> <p>The Stakeholder Involvement Plan is regularly updated (SEP).</p>
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IFC PS5: Land Acquisition and Involuntary Resettlement

5.1	<p>Integrate and maintain mitigation measures relating to land acquisition and compensation identified in the ESMP into the C-ESMP</p>	<p>Prevent economic displacement resulting from land acquisition and/or Project related transport and traffic</p> <p>Prevent grievances from affected land owners and users</p>	<p>IFC PS2 Best practice</p>	<p>Ivicom Energy</p>	<p>Development of C-ESMP</p> <p>Limited number of grievances which are quickly resolved</p>	<p>Prior to construction</p> <p>Maintaining mitigation measures during construction and operation</p>	<p>Completed</p> <p>Continuous monitoring of the situation on the ground in terms of involuntary displacement of the population.</p>
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5.2	Consider all grievances received in relation to compensation for affected land and assets or damages, including those under the responsibility of the municipality (e.g. expropriation) and address them/cooperate with responsible authorities to address them	Prevent economic displacement resulting from land acquisition and/or Project related transport and traffic Prevent grievances from affected land owners and users	IFC PS2 Best practice	Ivicom Energy	Development of C-ESMP Limited number of grievances which are quickly resolved	Prior to construction and throughout Project lifecycle	A grievance mechanism is in place. Complaints are inevitably resolved. Dismissals are recorded in the unified register of complaints. The Stakeholder Involvement Plan is regularly updated (SEP).
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FC PS6: Biodiversity Conservation and Sustainable Management of Living Material

6.1	<p>Integrate and maintain mitigation measures relating to biodiversity and sustainable management of living materials identified in the ESMP into the C-ESMP and O-ESMP</p> <p>This should include as a minimum:</p> <ol style="list-style-type: none"> 1) Appoint qualified professional(s) with expertise in birds and bats to: <ol style="list-style-type: none"> a) undertake pre-construction tree surveys for roosting bats, including ground level inspections, tree climbing and/or emergence/re-entry surveys to inform mitigation measures prior to and/or during felling. b) undertake a breeding bird survey of habitats affected during construction to determine locations of active nests, should works be undertaken between March and August. c) devise a methodology for bird and bat carcass monitoring of the WTGs and OHL over a minimum of three years from the first year of operation <p>The aim will be to:</p> <ul style="list-style-type: none"> - Assess adequacy of previous characterisation(s) of bird/bat use, residence, and passage - Re-evaluate impacts on birds and bats - Recommend changes to operating parameters (such as rotation speed or operating hours during sensitive periods/hours) and/or other mitigation - Reassess cumulative impact assessment on birds and bats and recommend additional mitigation, if required. <p>Appoint qualified professional(s) with expertise in botany to:</p> <ol style="list-style-type: none"> a) undertake pre-construction botanical surveys of permanent and temporary affected areas to map and record threatened, endemic and invasive plant species. b) prepare and oversee implementation of the HRRP and AIS. c) undertake monitoring of mitigation planting using native species and seeding over 10 years post construction. 	Minimize habitat loss and meet international best practice.	IFC PS6 Best practice.	Ivicom Energy Contractors	Development of C-ESMP Limited habitat loss	Prior to and throughout construction and operation	Constant presence of environmental protection experts and reporting on the current state of works and compliance with EIA and the Mott McDonald study.
	<p>If, during construction, a natural asset of geological-paleontological or mineralogical-petrographic origin is encountered, and which is assumed to have the status of a natural monument, the contractor is obliged to notify the competent Ministry of Environmental Protection within 8 days and take all measures to ensure that the natural asset it would not be damaged until the arrival of an authorized person.</p>	Minimize habitat loss and meet international best practice.	IFC PS6 Best practice.	Ivicom Energy Contractors	Development of C-ESMP Limited habitat loss	Prior to and throughout construction and operation	Constant presence of Engineers, experts in environmental protection, social relations and health and safety, who monitor whether the contractor's activities comply with this requirement.
6.2	<p>Before commencement of works, inform the contractors about the protected species of birds in the subject area and the appropriate measures encountered during the works.</p>	Minimize habitat loss and meet international best practice.	IFC PS6 Best practice.	Ivicom Energy Contractors	Development of C-ESMP Limited habitat loss	Prior to and throughout construction and operation	Completed. An integral part of the contract with the contractors is the EIA, as well as the Mott McDonald report.

6.3	<p>To prevent potential destruction of nests, eggs or chicks, vegetation removal must not be done during the main breeding season (February to August). When this is not possible, the project manager is obliged to organize a field inspection to identify the nest before starting the work. In the case of discovering a nest, a protective zone will be determined and marked, within which no work is allowed, until it is determined that the nest is no longer in use.</p> <p>In the period from 01.05. until 01.07. earthworks must not be carried out to remove the surface layer of soil with vegetation, because this is the most critical period for nesting birds. Sensitive and nationally important species (Ural owl and peregrine falcon) nest on the site and in its immediate vicinity, and during the execution of the works in question, the noise level must be maintained within the permitted limits in order to limit/avoid disturbance.</p>	Minimize habitat loss and meet international best practice.	IFC PS6 Best practice.	Ivicom Energy Contractors	Development of C-ESMP Limited habitat loss	Prior to and throughout construction and operation	Engineer regularly monitors the compliance of the work progress with the regularly updated schedule.
6.4	<p>Special attention should be paid to the species that are present in the subject area and that belong to the group of birds that are passive pilots, whose flight depends on thermal, so that due to their manoeuvrability and behaviour during flight, the vulnerability to collision is assessed as very high.</p> <p>Reducing the potential risk of collisions for the Bald Eagle (<i>Aquila chrysaetos</i>) by reducing the attractiveness of the wind farm area for birds of prey (to which the Bald Eagle belongs), especially the wind turbine locations:</p> <ul style="list-style-type: none"> - avoid natural or artificial sitting; - agricultural fields in the area of the wind farm should not be mowed or mowed before mid-July; - avoid objects inside the wind farm that attract birds (eg landfills); - the bases of the pillars must be made so that they are unattractive to birds of prey that feed there; - installing wind generators with tubular poles and avoiding other structures that are suitable for sitting are measures to reduce the activity of birds of prey in the area, and therefore to reduce the risk of collisions. 	Minimize habitat loss and meet international best practice.	IFC PS6 Best practice.	Ivicom Energy Contractors	Development of C-ESMP Limited habitat loss	Prior to and throughout construction and operation	Constant presence of environmental protection experts and reporting on the current state of works and compliance with EIA and the Mott McDonald study.
6.5	<p>Reducing the impact on quail (<i>Citurnix coturnix</i>): To compensate for the loss of quail breeding habitat, the following measures should be taken:</p> <ul style="list-style-type: none"> - Formation of strips rich in plants on the edges of fields and along field roads. It consists of the formation of strips rich in plants on the edges of fields and along field roads with a width of at least 5 cm, without the use of pesticides and artificial fertilizers, without mowing until August 1. - Leaving grain stubble on arable land. It consists of leaving grain stubble on arable land no later than February, the length of the stubble must be at least 20 cm, without the use of pesticides. 	Minimize habitat loss and meet international best practice.	IFC PS6 Best practice.	Ivicom Energy Contractors	Development of C-ESMP Limited habitat loss	Prior to and throughout construction and operation	Constant presence of environmental protection experts and reporting on the current state of works and compliance with EIA and the Mott McDonald study.

6.6	<p>Mitigation of Impacts on Bats During Construction: Noise, vibration, and light generated during construction will be a disturbance to bats that hunt, roost, or roost in the Project area. To eliminate or mitigate impacts to bats during construction, the following must be provided:</p> <ul style="list-style-type: none"> - Suspend or reduce the intensity of work in the period from dusk to dawn in the period of the most intense bat activity (April-October); - In this period, limit artificial lighting only to the zones of ongoing works, and direct the reflector to the zones where works are being carried out; - Cover the reflectors with protective covers that prevent light from scattering outside the working zone. 	Minimize habitat loss and meet international best practice.	IFC PS6 Best practice.	Ivicom Energy Contractors	Development of C-ESMP Limited habitat loss	Prior to and throughout construction and operation	Constant presence of environmental protection experts and reporting on the current state of works and compliance with EIA and the Mott McDonald study.
6.7	<p>Create and implement a Greening Plan in order to mitigate the negative visual impact in sensitive areas (rural settlements) in the wider area.</p> <p>Only indigenous plant species must be used for greening or recultivation. As a compensation measure in relation to the removal of forest vegetation, foresee afforestation and report it only with the planting of autochthonous species that have been locally removed, and in proportion to the areas occupied for the needs of wind farms and auxiliary facilities. The procedure of species selection and planting must be carried out with the consent and recommendations of the competent forest administration of PE "Srbijasume".</p> <p>The introduction of invasive plant species for afforestation is prohibited. Invasive (aggressive, allochthonous) species in Serbia are: <i>Acer negundo</i> (ash maple), <i>Amorpha fruticosa</i> (acacia), <i>Robinia pseudoacacia</i> (acacia), <i>Fraxinus pennsylvanica</i> (Pennsylvanian ash), <i>Celtis occidentalis</i> (hollow), <i>Ulmus pumila</i> (Siberian elm) <i>Prunus padus</i> (sremza), <i>Prunus serotina</i> (late sremza).</p> <p>The intervention is acceptable in order to speed up natural recovery, i.e. burying and sprinkling degraded areas with humus, leveling the terrain and planting autochthonous vegetation.</p>	Minimize habitat loss and meet international best practice.	IFC PS6 Best practice.	Ivicom Energy Contractors	Development of C-ESMP Limited habitat loss	Prior to and throughout construction and operation	Constant presence of environmental protection experts and reporting on the current state of works and compliance with EIA and the Mott McDonald study.

6.8	In order to anticipate and minimize disturbances caused by third parties, due to the use of the newly developed infrastructure for the needs of the Project, the Borrower will organize regular meetings of interested parties with the municipality and the administration of the national park, ensuring timely exchange of relevant information. (see article 1.8 above).	Minimize habitat loss and meet international best practice.	IFC PS6 Best practice.	Ivicom Energy Contractors	Development of C-ESMP Limited habitat loss	Prior to and throughout construction and operation	Regular meetings are organized with the local population in order to inform the local population and organizations about activities on the construction site that may have an impact on the functioning of individuals, households and organizations of the local community as a whole. The reports from those meetings are publicly published on the website of the project company.
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IFC PS7: Indigenous Peoples

- Not applicable

IFC PS8: Cultural Heritage

8.1	Develop and implement mitigation measures as part of the C-ESMP as identified in the ESMP	Minimise potential loss of cultural heritage Meet international best practice.	IFC PS8 Best practice.	Ivicom Energy Contractors	Development of C-ESMP Compliance with chance finds procedure	Prior to construction Maintenance of measures during construction and operation	The constant presence of Engineers, experts in life protection, social relations and OSH monitor whether the contractor's activities are aligned with this requirement.
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