

SCHEDULE 8
FORM OF ENVIRONMENTAL AND SOCIAL ACTION PLAN⁵

No.	Action	Environmental & Social Risks	Requirement (Legal, EBRD, Good Practice)	Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status Update June 2022
PR1	Assessment and Management of Environmental and Social Impacts and Issues						
1.	Benban E&S Management Maintain an active leadership role on the BSDA and proactively manage the Facility Manager, with the assistance of the BSDA E&S committee, to ensure that the Facility Manager is acting in accordance with Good International Practice, Lender E&S requirements and Egyptian Law.	E&S requirements implementations	EBRD PR1	Scatec Management	Year 0 as soon as the financing agreement with EBRD is signed	Active role on BSDA maintained Reporting to EBRD on BSDA activities on a quarterly basis as a minimum	Active role is maintained in BSDA Quarterly reporting shall be made to EBRD

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2.	Scatec E&S manager: Maintain within Scatec one person (the "E&S Manager") to be responsible for the implementation of the ESAP actions and of the Environmental, Social, Health and Safety requirements of the Egyptian legislation (including the EIA and Environmental Permit requirements) that are applicable to the Scatec Benban operations.	E&S requirements implementations	EBRD PR1	Scatec management	Year 0 as soon as the financing agreement with EBRD is signed	Responsibility assigned to a suitably qualified person. Name and contact of the responsible person provided to EBRD	Confirmed Mohamed Taha (E&S Compliance Manager) – email: mohamed.taha@scatec.com
3.	Permits and authorizations: Maintain all necessary environmental, social and health& safety permits and authorizations required under the Egyptian legislation for the Project activities under Scatec's control	Compliance with regulatory requirements	Egyptian law	Scatec E&S manager	As required by national regulations.	Permits and authorizations obtained and maintained.	Environmental permits are available (no necessity for renewal) Licenses from the Civil Defense are acquired for the six plots and are annually renewed (currently valid) Generation permit acquired and annually renewed

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4.	<p>E&S internal monitoring:</p> <p>Regular internal monitoring to verify the effective implementation of the ESAP actions and regulatory E&S requirements. Where gaps or non-compliances are observed, submit to the Lenders approval (i) an analysis of the gaps or non-compliances with the Lenders E&S requirements, and (ii) corrective or supplementary actions that will be undertaken by Scatec to close such gap or avoid such non-compliance.</p>	E&S obligations implementation	Egyptian law EBRD PR1	Scatec E&S manager	During the loan period	<p>Operation: Quarterly (first two years) then Annual reports issued internally</p> <p>Gap or non-compliances analysis conducted and corrective / supplementary actions submitted for non-objection to EBRD.</p>	<p>Internal audits are carried out monthly by the HSE coordinator on site, as well as daily inspections. There is an online system for reporting and following up on non-compliances till closure</p> <p>Audits are carried out by the E&S compliance manager at least twice annually. Audit results are followed up in the monthly E&S reports.</p> <p>Annual E&S reports are prepared and submitted to EBRD</p>

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5.	<p>E&S Reporting to EBRD</p> <p>Report to EBRD on:</p> <ul style="list-style-type: none"> Implementation status of the ESAP actions Environmental and social performance of the project activities 	Monitoring	EBRD PR1 IFC PS1	Scatec E&S manager, based on a template provided by EBRD	<p>Every six months during construction</p> <p>Every year after construction, until the end of the financing agreement</p>	Reports submitted to EBRD	Confirmed and reports are available
6.	<p>ESMPs and ESMSs</p> <p>Maintain ESMPs and ESMSs for the Scatec Benban sites, including an Occupational Health and Safety plan meeting Egyptian legislation and PR2 requirements and the Benban wide facility manager ESMSs.</p> <p>Seeking ISO 14001 and ISO 45001 certification of Scatec Benban facilities</p>	E&S management system	EBRD PR1 Good Int. Practices	Scatec E&S manager	<p>ESMPs in place throughout operations.</p> <p>Recommendation: ISO 14001 and ISO 45001 certification</p>	<p>ESMPs established and run by the E&S manager.</p> <p>Certification obtained after 3 years and maintained during the operational period of the PV plant</p>	<p>Confirmed, Environmental and Social Management Plans are available and regularly revised. Implementation by site takes place.</p> <p>ISO certification is available</p>

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7.	<p>Scatec subcontractors E&S performance:</p> <p>Include in all sub- contracts for the construction and operation of the Project</p> <p>(i) an obligation to act in compliance with EBRD's 2019 E&S Policy and IFC 2012 Performance Standards,</p> <p>(ii) an obligation to implement any corrective action required by EBRD in case of established non- compliance, and (iii) an obligation to implement the ESAP actions under the party's responsibility, if any.</p>	Compliance with applicable requirements	<p>Egyptian Law EBRD</p> <p>PR1 IFC</p> <p>PS1</p>	Contractors, on Scatec's request	During construction and operation	<p>Clause included in contractor's contracts.</p> <p>Corrective actions (if any) implemented.</p>	<p>Adherence to IFC anticorruption guidelines is included in all contracts.</p> <p>The required obligation towards IFC performance standards and EBRD corrective actions shall be included in coming contracts</p>

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PR2	Labour and Working Conditions						
8.	<p>Local employment</p> <p>Maintain a transparent procedure for the recruitment of local workers by Scatec and its subcontractors. Consult the local authorities and employment bureau before finalizing the procedure, and implement it.</p>	Local employment	<p>EBRD PR2</p> <p>Good International Practices</p>	Scatec E&S manager	Ongoing	Procedure implemented on an ongoing basis	<p>Local recruitment currently exceeds 35% through Scatec and its subcontractors. Subcontractor contracts include a clause for hiring the vast majority of workers from the villages of Benban</p> <p>A target of more than 30% local recruitment is specified in Scatec ESMP.</p>
9.	<p>Workers' grievance mechanism</p> <p>Maintain and implement a workers grievance mechanism, meeting PR2 requirements, for the operation activities under Scatec control. The mechanism will be cascaded to sub-contractors.</p>	Management of potential workers grievances	<p>EBRD PR2</p> <p>Good International Practices</p>	Scatec E&S manager	Throughout operation	<p>Grievance mechanism prepared by Scatec E&S Manager</p> <p>Grievance mechanism implemented by Scatec Solar</p>	<p>A grievance mechanism is prepared (documented plan) and implemented with grievance boxes spread across Scatec plots at relevant locations to provide possibility for anonymous grievance.</p> <p>An online Scatec grievance mechanism is also available to provide possibility for anonymous grievances</p>

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10.	<p>Human Resources Policy</p> <p>Maintain and appropriately communicate to Project employees an HR policy meeting Egyptian legislation and EBRD PR2 requirements. The HR policy must cover working relationships, non-discrimination and equal opportunity, workers' rights, wages, benefits and conditions of work, as well as GBVH (Gender Based Violence and Harassment). It should also refer to the workers grievance mechanism (see action above) and any potential retrenchment planning.</p>	HR policy	<p>EBRD PR2 IFC</p> <p>PS2</p> <p>Good International Practices</p>	Scatec E&S manager and HR manager	During construction and operation period	HR policy attached to workers contracts	An HR policy exists

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11.	<p>HR audits:</p> <p>Conduct audits of sub- contractors staff (monthly during construction, then twice a year during operation and limited to long-term non-employee workers) to verify that people working on activities under Scatec control are legally hired as per the Egyptian legislation.</p>	Labour code	<p>EBRD PR2</p> <p>National legislation</p>	Scatec E&S manager	During construction and operation	<p>HR audits and inspections carried out, and non-compliance addressed.</p> <p>Non-compliant contractors are first warned and have their contract terminated on second occurrence.</p> <p>Non-compliances reported in regular reports to EBRD</p>	Long term contractors they submit a copy of the Social Insurance and contract of their employees to HSE on site and workers interview is conducted regularly to ensure that they receive their rights.
12.	<p>Equal opportunities</p> <p>Operate the PV plant with a work environment that is suitable for both men and women (notably with separate toilets and change/rest rooms). Specify on job announcement that positions are open to both men and women. Promote equal opportunities by seeking a women / men ratio above the national average on the site during operation.</p>	Risk of unequal opportunities	<p>EBRD PR2</p> <p>National legislation</p>	Scatec E&S manager, in liaison with other Scatec teams, and with Scatec management support	During operation	<p>Clause included in contracts. Suitable work environment. Equal opportunities recruitment demonstrated.</p>	<p>Scatec promotes for diversity & inclusion. The HR policy & Code of conduct focus on equality for all employees regardless of their gender, religion, disability, sexual orientation, and race. Also, quarterly we conduct a survey for employees to ensure a good working environment and no discrimination or bias.</p> <p>For the recruitment we always ensure that we have both female and male shortlisted candidates for all positions and there is no reference for the gender in the job ad.</p> <p>We have a company KPI this year to increase the female representation</p>

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PR3	Resource Efficiency and Pollution Prevention and Control						
13.	Waste management Maintain practices of disposing of solid and liquid wastes in authorized sites only and in accordance with the management plans of the ESMS and the facility manager. Ensure third parties (such as the facility manager) are undertaking such practices consistent with the management plans and GIP.	Waste management	Egyptian law EBRD PR3	Scatec E&S manager	By Scatec during operation	Construction and operation wastes disposed in legally authorized sites	A waste management plan is maintained. All wastes are managed through the Facility management Company to legally authorized sites
14.	Solar panels waterless cleaning For solar panel cleaning, a waterless solution must be maintained.	Resource efficiency	EBRD PR3	Scatec E&S manager, in liaison with other Scatec teams, and With Scatec management support	During operations	Waterless solution used, or sustainable water use demonstrated.	Yes, dry cleaning is normally maintained. Wet cleaning takes place only when performance monitoring deems it necessary. The actual water use for cleaning purposes is almost half that was anticipated.

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PR4	Health and Safety						
15.	Scatec OHS Plan Scatec to maintain and implement Occupational Health and Safety plans meeting Egyptian legislation and PR2 requirements, respectively for the construction and operation period, for activities under Scatec control.	OHS Management	EBRD PR4	Scatec E&S manager	Throughout Operation	OHS plans maintained and implemented.	Yes, the plan is issued and is regularly revised
16.	Workers OHS training / induction Provide an OHS training consistent with the OHS plan to all workers involved in the Project, as well as induction for all visitors.	Workers protection	EBRD PR4	Scatec E&S manager	During construction and operation	Workers trained, log of trainings held.	Yes, OHS training logs are available and regular training and TBTs are provided

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PR10	Information Disclosure and Stakeholder Engagement						
17.	Stakeholder Engagement Plan Disclose and implement a Stakeholder Engagement Plan for the Project. Work in close coordination with other Benban developers to ensure PR10, including the presence of adequate CLOs, is being met.	Stakeholders information and awareness raising	EBRD PR10	Scatec E&S manager	According to the SEP's timetable	SEP disclosed and implemented	Yes, a SEP is available and is regularly revised. SE mainly takes place through the FMC through its community liaison officer, which also maintains a plan that is currently being revised
18.	Maintain CSR budget and implement the BSDA's CSR programme. Implement Community Development Initiatives tailored to the Project's financial capacity, targeting collective benefits for the local communities, with a focus on priority activities identified through a needs assessment.	Corporate social responsibility, Project integration	Good international practice	Scatec E&S manager	During construction and operation	CSR program issued and disclosed to the relevant stakeholders.	CSR program is part of the Benban solar park overall plan. Scatec pays its share for implementing the park strategy. The strategy is issued and being implemented by the BSDA SCR Manager. Scatec has implemented additional voluntary CSR activities the past two years.