

### Damietta Port Container Terminal II - Environmental and Social Action Plan (ESAP)

S. No.	Action Responsibility	Target and Evaluation Criteria for Successful Implementation	Required Completion Date
<b>1</b>	<b>PR1/PS1 - Assessment and Management of Environmental and Social Risks, Impacts and Issues</b>		
1.1	The company will identify and nominate Senior Management Members within existing corporate structures, who will be responsible for Environmental, Social, and H&S issues and to whom results of the ESMS management review will be reported. This structure shall be continued for the operation phase.	<ul style="list-style-type: none"> <li>a. List of Members Senior Management Members responsible for EHSS issues assigned.</li> <li>b. EHSS Organization chart showing lines of reporting on EHSS performance defined.</li> </ul>	<ul style="list-style-type: none"> <li>a. Start of construction/tentative date 26<sup>th</sup> Dec 2023.</li> <li>b. Start of construction/tentative date 26<sup>th</sup> Dec 2023.</li> </ul>
1.2	<p>During the construction phase, the company will appoint a suitably qualified EHSS manager, supported by health and safety, environmental and community liaison, and labor management specialists of the design and supervision consultant.</p> <p>A similar EHSS structure will be put in place by the main contractors (and subcontractors as relevant), to adequately support the ESMS implementation.</p> <p>The EHSS organization structure for the Consortium will consist of a minimum of an EHSS Manager and a community liaison/communication officer and will be reviewed prior to the operational phase and require Lender approval.</p>	<ul style="list-style-type: none"> <li>a. Letter of appointment of company EHSS manager and community/communication officer.</li> <li>b. EHSS manager, health and safety officers, environmental officers and community liaison officers, and labor specialists of the design and supervision consultant.</li> <li>c. EHSS structure for the operation phase.</li> </ul>	<ul style="list-style-type: none"> <li>a. Start of construction/tentative date 26<sup>th</sup> Dec 2023.</li> <li>b. Start of construction/tentative date 26<sup>th</sup> Dec 2023.</li> <li>d. Nov 2024</li> </ul>
1.3	The company will develop (i) an environmental policy; (ii) a health and safety policy; (iii) a social policy; (iv) a human rights policy; and (v) a code of conduct. Similarly, the company will develop an environmental and social management system (ESMS) that will include (i) procedures for the identification of Environmental, Health, Safety, and Social (EHSS) risks and impacts; (ii) subject-specific E&S Management Plans (ESMPs); (iii) an organizational EHSS structure including training and competency; (iv) emergency preparedness and response (v) monitoring, auditing, and review mechanisms; (vi) regulatory, permits and action tracking register; (vii) stakeholder engagement; and (viii) a community grievance mechanism.	<ul style="list-style-type: none"> <li>a. E&amp;S policies and Code of Conduct developed, endorsed by senior management and communicated to its contractors, service providers, and the workforce.</li> <li>b. Master document list and schedule for the development of all ESMS documents, registers, etc., including subject specific ESMPs.</li> <li>c. First draft of ESMS manual including supporting plans and procedures.</li> </ul>	<ul style="list-style-type: none"> <li>a. Start of construction/tentative date 26<sup>th</sup> Dec 2023.</li> <li>b. Start of construction/tentative date 26<sup>th</sup> Dec 2023.</li> <li>c. Start of construction/tentative date 26<sup>th</sup> Dec 2023.</li> <li>d. Nov. 2023</li> </ul>

S. No.	Action Responsibility	Target and Evaluation Criteria for Successful Implementation	Required Completion Date
	<p>commencing including all required risk assessments (e.g., OHS risk assessment).</p> <p>This ESMS will be updated prior to the operational phase and supplemented with the required standard operating procedures and work instructions.</p>	<p>d. Submittal of all ESMPs no later than 30 days prior to CT-II construction</p> <p>e. Updated ESMS for the Operational phase supplemented with the required standard operating procedures and work instructions.</p>	<p>e. Oct. 2024</p>
1.4	<p>As the project evolves, should a pre-entry parking area be developed by DPA for CT-II operations to remain viable, this would become an associated facility and will require to be managed in accordance with EBRD PRs/IFC PSs.</p>	<p>Agreed approach prior to the construction of a pre-entry parking area.</p>	<p>When required</p>
1.5	<p>If a rail track connection is built to CT-II, this would be financed by the company and an E&amp;S assessment will be required to be undertaken and an approach agreed to with the Lenders.</p>	<p>E&amp;S assessment and agreed approach for the rail track connection to CT-II.</p>	<p>When required</p>
1.6	<p>The company will assign a qualified third-party consultant to assess the potential risks and impacts to the fishing stocks and recommend the required control measures, in line with the EBRD PRs/IFC PSs, and commensurate with the project risk and impacts</p>	<p>a. Terms of reference (ToR) for the assessment.</p> <p>b. Letter of appointment of a qualified third-party consultant.</p> <p>c. Assessment report</p>	<p>a. Feb 2024</p> <p>b. Mar 2024</p> <p>c. Sep 2024</p>
1.7	<p>The company will develop and implement a Contractor Environmental and Social Management and Monitoring Plan (CESMMP). The CESMMP will include explicit requirements to comply with legal requirements, the EIA, the EIA approval permit conditions, EBRD PRs, IFC PSs, WBG applicable Guidelines, GIIP and all relevant company policies, code of conduct, supply chain and management, monitoring programs (e.g., ESMPs), the required EHSS organization, training, and OHS requirements to be followed.</p>	<p>a. ToR for CESMMP</p> <p>b. CESMMP to the satisfaction of the Lenders.</p> <p>c. Evidence substantiated for CESMMP implementation</p>	<p>a. Start of construction/tentative date 26<sup>th</sup> Dec 2023.</p> <p>b. Nov. 2023</p> <p>c. Jan 2024</p>

S. No.	Action Responsibility	Target and Evaluation Criteria for Successful Implementation	Required Completion Date
1.8	The company will develop EHSS monitoring, auditing, and reporting requirements including Key Performance Indicators (KPIs).	<ul style="list-style-type: none"> <li>a. EHSS monitoring, audit, and reporting procedure including reporting templates and KPIs.</li> <li>b. Evidence of EHSS implementation.</li> <li>c. Third party E&amp;S audits quarterly during construction phase and bi-annually during operation phase for the first two years and annually thereafter.</li> </ul>	<ul style="list-style-type: none"> <li>a. Nov 2023</li> <li>b. Mar 2024</li> <li>c. Mar 2028 – end of loan agreement</li> </ul>
1.9	The company will develop and implements a robust Procurement Policy and Supplier Selection and Management Process to identify, manage and remediate supply chain risks associated with major suppliers, including main construction contractors and major equipment suppliers and procurement process. This should cover details of probable and identified suppliers, labour exploitation (modern slavery, Child labour, forced labour, GBVH), as well as any other significant environmental and human rights risks and impacts associated. The supplier selection and management process should focus on performance of a supplier on four key areas of Environment, Labour and human rights, Ethics and Sustainable procurement, not just cost and quality. Prepare a monitoring and audit plan/procedure for evaluating supply chain for EHSS aspects.	<ul style="list-style-type: none"> <li>a. Procurement Policy and Supplier Selection and Management Process compliance with EBRD and IFC standards</li> <li>b. Prepare a monitoring and audit plan/procedure for evaluating supply chain for EHSS aspects.</li> </ul>	<ul style="list-style-type: none"> <li>a. Dec. 2023</li> <li>b. Jan. 2023</li> </ul>
<b>2</b>	<b>PR2/PS2 - Labour and Working Conditions</b>		
2.1	The company will develop project-specific Human Resource (HR) plans and procedures aligned with EBRD PR2/IFC PS2 requirements and national requirements. The HR plans and procedures will be communicated transparently and effectively to all the company and contractor workers. The company will contractually require contractors and subcontractors to align their HR plans and procedures, with the company HR plans and procedures	<ul style="list-style-type: none"> <li>a. Manpower influx and management plan.</li> <li>b. HR plans and procedures for the construction phase.</li> <li>c. HR communication and training procedure.</li> <li>d. E&amp;S contractual provisions including HR related provisions in legal agreements with the EPC contractor and subcontractors.</li> </ul>	<ul style="list-style-type: none"> <li>a. Start of construction/tentative date 26<sup>th</sup> Dec 2023.</li> <li>b. Start of construction/tentative date 26<sup>th</sup> Dec 2023.</li> <li>c. Oct 2023</li> <li>d. Start of construction/tentative date 26<sup>th</sup> Dec 2023.</li> </ul>

S. No.	Action Responsibility	Target and Evaluation Criteria for Successful Implementation	Required Completion Date
		e. HR plans and procedures updated for the operation phase.	ve date 26 <sup>th</sup> Dec 2023. e. Oct 2024
2.2	The company will hire an HR manager with adequate expertise and working knowledge of international lender standards and national labor legislation, to effectively implement the company HR policies, plans, and procedures in line with the EBRD PR2/IFC PS2 requirements.	a. IFC approval of Curriculum Vitae of HR manager. b. Letter of appointment of HR manager.	a. Start of construction/tentative date 26 <sup>th</sup> Dec 2023. b. Start of construction/tentative date 26 <sup>th</sup> Dec 2023.
2.3	In the event worker accommodation is required during the construction or operations phases, whether within or outside the port, the accommodation will be in line with the IFC/EBRD Guidance Note on Workers Accommodation.	a. Assessment report on accommodation suitability. b. Accommodation audit prior to occupancy.	c. Start of construction/tentative date 26 <sup>th</sup> Dec 2023. d. Jan 2024
2.4	The company will develop a formal Worker Grievance Redress Mechanism (WGRM) and associated procedures for the construction and operations phases of the project, in line with EBRD PR2/ IFC PS2 requirements.	Worker WGRM procedure to the satisfaction of the Lenders.	Jan 2024
2.5	The company will prepare an Occupational Health and Safety (OHS) plan that will include the necessary control procedures to mitigate relevant OHS risks in line with WBG General EHS Guidelines, WBG EHS Guidelines for Ports, Harbors and Terminals and GIIP	a. OHS plan and supporting procedures to the satisfaction of the Lenders. b. OHS committee formed and mandate defined.	a. Start of construction/tentative date 26 <sup>th</sup> Dec 2023. b. Feb 2024
2.6	All workers/employee contracts provided by the company will include the following clauses: <ul style="list-style-type: none"> <li>• Reference to the Consortium’s Human Resource Policy and Procedures.</li> <li>• Stipulating the working hours for contract workers including any overtime payments.</li> </ul>	Signed contract samples compliant with EBRD PR2 and IFC PS2 provided to all workers and employees	Prior to the hiring of the employees/workers

S. No.	Action Responsibility	Target and Evaluation Criteria for Successful Implementation	Required Completion Date
	<ul style="list-style-type: none"> <li>Annual leave entitlements should be a minimum of 21 days, as per Egyptian legislation.</li> </ul>		
2.7	The company will develop internship and apprenticeship opportunities for female students and graduates and disclose opportunities at universities and technical colleges.	Regular records of action taken	Jun 2024 onwards
2.8	The company will implement women working group to empower women in engineering and technical roles and disclose information regarding the working group to all female employees.	Regular records of action taken	Jun 2024 onwards
2.9	The company will ensure that any temporary on-site facilities for construction and permanent facilities for operation include separate sanitation facilities for males and females i.e., female toilets to minimise GBVH.	Separate sanitation facilities are provided during construction and operation for females.	Start of construction/tentative date 26 <sup>th</sup> Dec 2023.
3.0	<p>The company will support access to market-relevant skills and training for the local population in the Damietta region by developing a new or updated training programme responding to new or emerging skills demanded for the sector's expansion and to the extent possible take into consideration opportunities to support women' representation.</p> <p>The company will engage in a formal partnership with a local education/ training provider.</p>	<p>Practices of the relevant stakeholder improved (skills development)</p> <p>Partnership between private sector and education providers established or strengthened</p> <p>Training programme developed and implemented for a minimum of 120 persons</p>	Within 3 years of signing the CTA
<b>3</b>	<b>PR3/PS3 - Resource Efficiency and Pollution Prevention and Control</b>		
3.1	The company will monitor fuel and water consumption and define measures to improve efficiency during the operation phase (e.g., maximize use of electrical RTG's). Similarly, the	<p>a. Resource efficiency monitoring and continuous improvement procedure.</p> <p>b. Design considerations for resource-efficient certified buildings</p>	<p>a. Mar 2024</p> <p>b. Mar 2024</p>

S. No.	Action Responsibility	Target and Evaluation Criteria for Successful Implementation	Required Completion Date
	company will consider the use of energy efficient certified buildings		
3.2	<p>The company will undertake regular monitoring of air and noise emissions, effluent discharges and water quality, and implement measures as required in line with the PSs and WBG EHS Guidelines.</p> <p>Marine life, coastline, and water quality to be carried out as provided in the EIA approval, the Consortium to liaise with DPA and EEAA for methodology covering number of samples, locations, frequency, parameters and methods to be used.</p>	<p>a. Air emissions, noise emissions, effluent discharges, water quality, maritime and coastline monitoring procedure and program for the construction phase</p> <p>b. Air emissions, noise emissions, effluent discharges, water quality, maritime and coastline monitoring procedure and program for the operations phase</p> <p>c. Year 1 monitoring report of air, noise, water quality, effluent, maritime life, and coastline.</p>	<p>a. Nov. 2023</p> <p>b. Oct 2024</p> <p>c. Dec 2025</p>
3.3	<p>During operation the company need to follow:</p> <ul style="list-style-type: none"> <li>Regulation (EU) 2016/1628 of the European Parliament and of the Council of 14 September 2016 on requirements relating to gaseous and particulate pollutant emission limits and type-approval for internal combustion engines for non-road mobile machinery, amending Regulations (EU) No 1024/2012 and (EU) No 167/2013, and amending and repealing Directive 97/68/EC (Text with EEA relevance)</li> <li>In situations where fuel quality to operate the engines is not compliant with the above Regulation, the Supplier will have provided proof that even though the engine is different class, it will comply with gaseous and particulate pollutant emission limits as per the above Regulation.</li> </ul>	<p>Prior discussion and agreement with Lenders</p>	<p>Oct 2024</p>

S. No.	Action Responsibility	Target and Evaluation Criteria for Successful Implementation	Required Completion Date
3.4	<p>As an integrated part of the detailed design of CT2, there needs to be an assessment of the design and / or maintenance requirements and changes needed to ensure that the current Wastewater Treatment Plant (WWTP) is maintained to consistently deliver compliance with the standards contained within the Urban Wastewater Directive and GIIP.</p> <p>Provide a report to the lender’s consortium showing the changes required to the plant, and a timeframe, to ensure that the plant will deliver full compliance prior to the commissioning of CT2. Provide an annual report on the effluent discharge testing results, based on a minimum of monthly testing.</p>	<ul style="list-style-type: none"> <li>a. Report to lenders on assessment and updates to be made.</li> <li>b. Annualised results reporting</li> </ul>	<ul style="list-style-type: none"> <li>a. Mar 2024</li> <li>b. Dec 2024</li> </ul>
3.5	<p>The project will be designed so that no stormwater drains and/or wastewater, discharge directly into surface waters during CT-II operations. Oil/water separators and sewage treatment plants will be used and maintained in good working condition.</p>	<p>Design demonstrating sewage connected to wastewater treatment plants and stormwater drains connected to oil/water separators.</p>	<p>Mar 2023</p>
3.6	<p>Waste management plan on site should be implemented in line with EU Waste Framework Directive (including EU waste catalogue) and good international practice. Please note that classification of hazardous wastes in Egypt differs from EU. Construction and operational waste should be handled by licenced contractor, which have capacity to recycle or dispose the waste in line with EU requirements.</p> <p>A safe, secure and well-labelled waste storage area should be installed at CT2, situated on hardstanding and covered from the rain. This should allow for clear segregation of hazardous from non-hazardous wastes.</p>	<ul style="list-style-type: none"> <li>a. Preparation of a Waste Management plan.</li> <li>b. Onboarding a licenced contractor/s for waste collection and disposal</li> <li>c. Waste area installed and proper implementation of waste management plan at site</li> </ul>	<ul style="list-style-type: none"> <li>a. Nov. 2023</li> <li>b. Dec 2024</li> <li>c. Jan 2024</li> </ul>

S. No.	Action Responsibility	Target and Evaluation Criteria for Successful Implementation	Required Completion Date
3.7	<p>A GHG Management Plan should be implemented including the following actions:</p> <ul style="list-style-type: none"> <li>• An operational phase GHG emissions footprint should be compiled to assist in establishing a quantified GHG benchmark and identification of areas for GHG emissions reductions.</li> <li>• Actions to reduce GHG emissions, and indeed other pollutants to atmosphere shall include the consideration of low emissions technology which might include the procurement of the latest electric cargo-moving equipment.</li> <li>• Develop a GHG Management Plan, including above mentioned actions,</li> <li>• Annual monitoring reports, and defining which GHG emissions Scope (1, 2 or 3) will be applied.</li> </ul>	<ul style="list-style-type: none"> <li>a. GHG baseline report</li> <li>b. Action plan for GHG reduction</li> <li>c. Annual monitoring reports</li> </ul>	<ul style="list-style-type: none"> <li>a. Oct 2024</li> <li>b. Oct 2024</li> <li>c. Oct 2025 onwards</li> </ul>
3.8	To ensure Project’s resilience to climate changes implement mitigation measures – as specified in the Climate Resilience Review	Annual review and reporting on the implementation	Oct 2025
4	<b>PR4/PS4 - Health and Safety</b>		
4.1	A traffic risk and impact assessment will be undertaken by the company, including route risk assessments, to minimize impacts to the local surrounding communities. This traffic risk and impact assessment will also determine whether there would be a benefit to developing a pre-entry parking area to be used by CT-II.	<ul style="list-style-type: none"> <li>a. Traffic risk and impact assessment terms of reference agreed with IFC</li> <li>b. Traffic risk and impact assessment report</li> </ul>	<ul style="list-style-type: none"> <li>a. Feb 2024</li> <li>b. CoD - 2nd</li> </ul>
4.2	The company will develop a security management plan, based on a security risk assessment, in alignment with IFC PSs, IFC Good Practice Handbook on Use of Security Forces: Assessing and Managing Risks and Impacts, and IMO International Ship and Port Facility Security (ISPS) Code.	<ul style="list-style-type: none"> <li>a. Security risk assessment completed prior to the operation phase.</li> <li>b. Security management plan completed to the satisfaction of the IFC</li> </ul>	<ul style="list-style-type: none"> <li>a. Oct 2024</li> <li>b. June 2025</li> </ul>
4.3	The company will undertake a risk assessment considering wider port operations and prepare an Emergency Response Plan	<ul style="list-style-type: none"> <li>a. Risk assessment report completed prior to the operations.</li> </ul>	<ul style="list-style-type: none"> <li>a. Dec 2024</li> <li>b. Dec 2024</li> </ul>

S. No.	Action Responsibility	Target and Evaluation Criteria for Successful Implementation	Required Completion Date
	(ERP) ensuring coordination in response by the Port and other tenants/parties.	b. Emergency response plan in place to the satisfaction of the Lenders	
<b>5</b>	<b>PR8/PS8 - Cultural Heritage</b>		
5.1	The company will develop an effective, IFC and EBRD compliant Chance Find Procedure for the Project, implemented and communicated to all on-site personnel and contractors during the site induction process.	a. Chance Find Procedure developed. b. Onsite staff & and contractor sign-off during induction	a. Oct 2023 b. Jan 2023
<b>6</b>	<b>PR10/PS1 - Information Disclosure and Stakeholder Engagement</b>		
6.1	The company will implement the Stakeholder Engagement Plan (SEP) including the grievance mechanism which is accessible by the community at the Project site, via email, Project website, and telephone hotline. The SEP should be disclosed and communicated to stakeholders.	a. Documentation of stakeholder engagement activities b. Evidence of accessible grievance mechanism to the community, suggestions log, and resolution records	a. Dec 2023 b. Dec. 2023
6.2	The company will disclose timely information to stakeholders regarding: <ul style="list-style-type: none"> <li>• Timings of construction activities (including movement of trucks and vehicles)</li> <li>• Potential access restriction to roads or other areas for local communities</li> <li>• Grievance mechanism.</li> </ul>	Disclosure on the company website	a. Nov. 2023