

ANNEX I: ENVIRONMENTAL AND SOCIAL ACTION PLAN

SCHEDULE A: Environmental & Social Action Plan

Table MYTILINEOS – AGIOS NIKOLAOS 826MW CCGT - Environmental and Social Action Plan

No.	Action	Environmental Risk, Liability / Benefit	Legislative Requirement / EBRD / Good practice	Investment Needs / Resources Costs	Timetable Action to be Completed	Target and Evaluation Criteria for Successful Implementation	Comment
PR1 Assessment & Management of Environmental and Social Impacts and Issues							
1.1	<p>ESHS Management System</p> <p>MYTILINEOS will maintain a corporate environmental, health and safety management system, and apply this management system throughout the Agios Nikolaos CCGT project</p> <p>This will include and ESG and EHS management systems and ensure ESG reporting and disclosure in line with EU environmental requirements.</p> <p>As part of Project EHS management system appoint a designated, site-level person will be responsible for EHS issues relating to Agios Nikolaos CCGT and will be responsible for site-level implementation of corporate management systems.</p>	<p>Maintain ESG corporate management systems and ensure adequate reporting of ESH issues.</p> <p>Management of HSSE risks in accordance with Lender Requirements.</p>	<p>Good Practice</p> <p>EBRD PR1</p>	<p>Internal Cost</p>	<p>Ongoing</p>	<p>Project-level HSSE Policy submitted to Lenders.</p>	<p>The Project will implement the Companies existing ESHS management systems.</p> <p>The requirements of the Project HSSE Policy shall be contractually cascaded to EPC & O&M (MYTILINEOS Sustainable Energy Solutions Business Unit), and throughout the Project (including Subcontractors).</p>

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1.2	<p>National Permits, Licences, Consents & Authorisations</p> <p>Obtain and maintain necessary outstanding permits</p> <p>If there are any design changes, obtain necessary permits as required.</p>	Compliance with National Regulatory Requirements.	National Legislation EBRD PR1 / 3 / 4	Internal Cost	Prior to activities for which authorisations are required	Ensure compliance during construction and operation. Checklist of all required permits & authorisations required for the Project, construction- and operational-phases, included within the Project's Management Plans (see ESAP Item 1.3).	-
1.3	<p>ESHS Management Plans</p> <p>Mytilineos will maintain – at Agios Nikolaos CCGT project-level - a corporate Environmental, Social, Health and Safety ("ESHS") management system consistent with ISO14001 including Energy Efficiency, ISO 9001, ISO 26000, ISO45001 as well as maintain an energy management audit procedure and undertake an energy audit if required.</p> <p>The system shall include the</p>	Optimisation of management through a formalised system.	Good Practice BAT EBRD PR 1, PR 2 and PR 10 E&S Policy	Internal Costs	Ongoing	Maintain certification of management systems procedure in place including MYTILINEOS & EPALME (see ESAP Item 1.1),	-
					Prior to Commencement of Commissioning	Commissioning-phase Environment & Social Management Plan (CoESMP) submitted to Lenders, reviewed, and approved.	CoESMP to bridge the 'construction' and 'operational' phase of the Project. May be based on CESMP and updated to account for commissioning activities.

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	<p>following requirements:</p> <ul style="list-style-type: none"> Grievance Mechanism for internal and external stakeholders inclusive of contractors. Stakeholder Engagement Plan Chain of custody management 				Prior to Commencement of Operations (COD)	Operational-phase Environmental & Social Action Plan (OESMP) to be submitted to Lenders, reviewed and approved.	
1.5	<p>Workers Accommodation</p> <p>Ensure best practice IF REQUIRED (by Company or contractors), workers' accommodation facilities should be designed to meet regulations; and,</p> <p><i>Workers' Accommodation: Processes and Standards: A guidance note by IFC and the EBRD, September 2009.</i></p> <p>Workers' accommodation planning should also integrate the Project's <i>COVID-19 Risk Assessment</i> recommendations.</p>	<p>Ensure safety and wellbeing of workers.</p> <p>Minimise risk of incidents and accidents.</p> <p>Minimise risk of social conflicts.</p>	Good Practice EBRD PR 1	Internal Cost	Ongoing following construction of Workers' Accommodation	<p>Records of inspections.</p> <p>Records of any Worker grievances.</p> <p>Records of any Worker feedback.</p>	<p>It is noted that – at present – construction of Workers' Accommodation Camps are not required.</p> <p>In which case, the Project shall audit the community accommodation used to house expatriate workers (direct workers, or subconsultant workers).</p> <p>Findings are presented to the Lenders in quarterly reports during construction.</p>
1.6	<p>Quarterly Construction Monitoring</p> <p>As part of internal ESG and EHS management systems, the</p>	Confirmation that Lenders'	Good Practice EBRD PRs	Cost of Environmental & Social Consultant	From Financial Close, throughout	ESC <i>Audit Reports</i> to be provided to Lenders in a quarterly	The IESC shall have demonstrable experience in auditing CCGT project's to

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	Company will undertake audits of construction activities by Environmental, Health and Safety, Social and Labour (EHSS) specialists. The scope will include the OHTL.	Requirements and EHSS Management System is being implemented at site-level.		(ESC)	Construction Period.	basis. (In addition to regular monthly monitoring reports provided by MYTILINEOS / METKA) to the Lenders.	International Lender Requirements. The proposed IESC shall be reviewed and approved by EBRD, prior to instruction.
1.7	6 Monthly Operational Monitoring for 1st Year The Project shall be subject to independent audits of construction activities by Environmental, Health and Safety, Social and Labour (EHSS) specialists.	Confirm how the project's operational impacts and risks are being managed.	Good Practice EBRD PRs	Cost of Independent Environmental & Social Consultant (IESC)	From COD, every 6 months for the first year (12 month period).	IESC <i>Audit Reports</i> to be provided to Lenders. (In addition to regular annual monitoring reports provided by MYTILINEOS / METKA).	The IESC shall have demonstrable experience in auditing CCGT project's to International Lender Requirements. The proposed IESC shall be reviewed and approved by EBRD, prior to instruction.
PR2 Labour & Working Conditions							

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2.1	<p>Worker Grievance Mechanism</p> <p>Ensure that a project-level Worker Grievance Mechanism is established; and extended to all site workers: direct; EPC; O&M; and Subconsultants.</p>	Provide a channel for raising workers' concerns and a transparent, consistent mechanism for resolution.	EBRD PR2	Internal Cost	Prior to 1 st Disbursement	<p>Implementation of Grievance Mechanism allowing anonymous complaints and suggestions.</p> <p>Register of grievances and suggestions and their resolution.</p> <p>Grievance and suggestion boxes available across the project site.</p>	<p>It is noted that construction has commenced; and therefore, demonstration of an implemented Grievance Mechanism is required prior to 1st Disbursement.</p> <p>The Grievance Mechanism shall formally allow for anonymous complaints and suggestions.</p> <p>Ensure that Suggestion / Grievance forms are available on the website.</p>
2.2	<p>Employment Policy Document (EPD)</p> <p>Implement the corporate <i>Employment Policy Document</i> (EPD) for the construction phase.</p> <p>The EPD should build upon the <i>Human Resource Policy</i> (ESAP Item 2.1) and <i>GBVH Policy</i> (ESAP Item 2.2), and will address:</p> <ul style="list-style-type: none"> ▪ Working conditions; ▪ Terms of employment (e.g. working hours, overtime); 	Ensure cascading of core PR2 requirements through the contracting chain, and to ensure ongoing monitoring of-, and reporting on-, performance of EPC and all Subcontractors.	National Legislation Good Practice EBRD PR2	EPD Development – Internal Costs, and if required, External Consultants	Ongoing	<p>Maintain compliance with PR 2 and National legislation</p> <p>First <i>EPD Implementation Report</i> – including audit findings – to be submitted to the</p>	<p>It is noted that construction has commenced; and therefore, demonstration of an implemented Grievance Mechanism is required prior to 1st Disbursement.</p> <p>Compliance with the EPD, including verification of the Project Company's internal auditing and report findings, will also form part of the IESC</p>

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	<ul style="list-style-type: none"> ▪ Informing workers of their rights; ▪ Child Labour; ▪ Forced Labour; ▪ Equal Opportunities / Non-Discrimination (including Gender); ▪ Workers' Organisations; ▪ Workers' Accommodation (see ESAP Item 1.6); ▪ Occupational Health & Safety; and ▪ Workers' Grievance Mechanism (ESAP Item 2.4). <p>The EPD should include targets and procedures for recruitment of local workers, goods and services, where possible.</p>					Lenders.	monitoring (see ESAP Item 1.7).
2.3	<p>Labour Risks in Supply Chain</p> <p>During the procurement process, put in place a mechanism for checking the presence/absence of Child Labour; Forced Labour; and high risks of significant safety issues; in the production of core materials and equipment.</p>	Minimise risk of Child Labour being used in core supply chain.	EBRD PR2	Internal Cost	Ongoing	Specific tender clauses on the exclusion, and definition, of 'forced' and 'child' labour; together with requirements to undertake a <i>Supply Chain Risk Assessment</i> ; monitoring; and verification.	

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PR3 Resource Efficiency and Pollution Prevention and Control							
3.1	<p>Continuous Ambient Air Quality Monitoring & Management Plan</p> <p>As part of the Projects CESMP and OESMP (see ESAP Item 1.3); the project shall implement Air Quality Monitoring and develop an Air Quality Management Plan. This can be integrated within the site-level (i.e. Agios Nikolaos Industrial Complex); providing that the monitoring design accounts for the specific pollutants and air impact assessment findings of the Project.</p> <p>For instance, monitoring may include nitrogen dioxide (NO₂) diffusion tube monitoring at key locations; and monthly tube changes.</p>	Management and verification of potential air quality risks, in order to demonstrate the impacts are in line with ESIA projections and within acceptable thresholds (National Thresholds and Lenders' Requirements).	EBRD PR3	Internal Cost; together with external consultants (as required)	2021	Develop an <i>Air Quality Monitoring Plan</i> which sets out locations and methodology. Submit plan to Lenders for review.	-
					1 Year Prior to Commercial Operation Date (COD)	Commence Ambient Air Quality Monitoring in lien with plan. Include findings within Lender reporting.	-
					Project Commercial Operation Date (COD)	Upon Project COD, continue to monitor for a period of two (2 no.) years. Include findings within Lender reporting.	-
3.2	<p>Best Available Techniques (BAT): Associated Emission Limits (AEL), NOx and CO</p> <p>The project must comply with the AELs set out for NOx and CO, as set out under the <i>Best Available Techniques (BAT)</i></p>	Control of air emissions and associated impacts	Best Available Techniques (BAT) EBRD PR3	Internal Cost	Prior to Completion	Compliance to be confirmed in commissioning report.	The Project is designed to fully comply with BAT .

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	<p><i>Reference Document for Large Combustion Plants (BREF).</i></p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th colspan="2">AEL (mg/Nm³)</th> </tr> <tr> <th>Yearly</th> <th>Daily</th> </tr> </thead> <tbody> <tr> <td>NOx</td> <td>30*</td> <td>40*</td> </tr> <tr> <td>CO</td> <td><30*</td> <td></td> </tr> </tbody> </table> <p>* AEL subject to correction factor, taking into account Net Electrical Efficiency – see BREF for guidance.</p>		AEL (mg/Nm ³)		Yearly	Daily	NOx	30*	40*	CO	<30*		arising from the Project.					
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	Yearly	Daily																
NOx	30*	40*																
CO	<30*																	
3.3	<p>Best Available Techniques (BAT): Net Electrical Efficiency</p> <p>The project must comply with BAT Net Electrical Efficiency, as follows:</p> <ul style="list-style-type: none"> Project Commercial Operation Date (COD): >57% 	Ensure efficient resource consumption and power generation.	Best Available Techniques (BAT) EBRD PR3	Internal Cost	Commissioning	In Commissioning report written statement provided to Lenders to demonstrate BAT Net Electrical Efficiency compliance has been integrated within the Project and fully considered and costed throughout the project's operation.	The Project is designed to comply with BAT											

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3.4	<p>Continuous Emissions Monitoring System (CEMS)</p> <p>Install continuous emissions monitoring systems (CEMS) on all emission stacks (main - and where applicable, bypass-stacks).</p> <p>Ensure that the position of installed monitoring portals (sampling locations) for both CEMS and extractive testing, comply with international standards for this sampling (EN15259), in particular in order to ensure homogenous flow and avoidance of turbulent zone sampling.</p> <p>A homogenous flow specialist assessment should be undertaken prior to installation of the CEMS in order to confirm that the installation portals are in the correct position.</p>	Minimisation of pollution.	Good Practice Best Available Techniques (BAT) EBRD PR3	Internal Cost	<p>CEMS on all locations with correct portals prior to plant commissioning.</p> <p>Survey of monitoring portals against the EN 15259 standard prior to any detailed design finalisation and prior to release of tender package for installation (to ensure valid sampling and monitoring results).</p>	Monitoring reports. Monitoring portals to be installed in line with EN 15259 (2007 or latest version)	-

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3.5	<p>Carbon-Capture-Storage (CCS) Readiness and Hydrogen (H₂) Fuel Blending Options Appraisal</p> <p>Further evaluate opportunities to reduce the carbon impacts associated with the project.</p> <p>As a minimum, this shall include a formal review every five (5 no.) years from COD on the CCS implementation and Hydrogen (H₂) fuel mixing.</p> <p>Undertake a new study in 2025 and develop a road map to attain 2030 and 2050 EU targets.</p>	Reduction of GHG impacts as/when technology becomes technically and economically viable.	Best Available Techniques (BAT) EBRD PR1	Internal Costs. External Consultants (if required)		Provide a report to the Lenders, <i>CCS Readiness and Hydrogen (H₂) Fuel Blending: Feasibility and Options Appraisal for the reduction of Project GHG Impacts.</i>	-
					Before 31 December 2025	Provide a study to the Lenders, presenting a roadmap of how the Project can align with 2030 and 2050 EU decarbonisation targets.	Following review by the Lender, the Client shall publicly disclosed the documents.
3.6	<p>Commission Audit within 1 Year of Operation (COD)</p> <p>Audit shall be inclusive of:</p> <ul style="list-style-type: none"> ▪ NO_x emissions; ▪ noise; 	Verification of operations.	Good Practice Best Available Techniques (BAT)	Independent consultant, with demonstrable	Within 1 year of Project (CCGT) Operations (COD).	Compliance Report and Action Plan.	The reports shall be submitted to the Lenders for review.

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	<ul style="list-style-type: none"> ▪ water use, impacts, and strategy for reduction; ▪ labour compliance; ▪ Greenhouse Gas (GHG) Emissions; and ▪ Carbon-Capture-Storage (CCS) Readiness. <p>The audit shall include verification that the plant operation is aligned with <i>Best Available Techniques (BAT)</i>. Repeat the audit every five (5 no.) years and develop an action plan based upon the findings.</p>		EBRD PR1	track-record in auditing CCGT projects against International Lender requirements.	Repeat audits every 5 years thereafter.	The Terms of Reference for the audit, and selection of the Consultant, shall be approved by the Lenders prior to instruction.	
PR4 Health & Safety							
4.1	<p>COVID-19 Risk Assessment</p> <p>The Project has produced a <i>COVID-19 Risk Assessment</i>, which shall be updated and maintained throughout the delivery of the Project.</p> <p>The risk assessment shall be aligned with International Good Practice, such as the European Agency for Safety and Health at Work (EU-OSHA); Institution of Occupational Safety and Health (IOSH); World Health Organisation (WHO); and International Labour Organisation (ILO).</p>	Continued management of COVID-19 risks; protection of workforce and local communities.	Good Practice EBRD PR 1, 2 & 4	Internal Cost. External Consultants (as required). Coordination with Contractors.	Updated on an ongoing basis to align with local; national; and international guidance.	COVID-19 Risk Assessment for review upon request. COVID-19 Risk Assessment fully integrated in HR management, procurement, and Community Health & Safety arrangements – particularly Emergency Preparedness and Response planning.	The risk assessment should be cognisant of the additional pressures on local medical resources; be fully integrated across the project management; and identify responsible persons throughout the Project Management structure for ensuring that the risk assessment findings are effectively implemented.

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4.2	<p>Traffic Management Plan</p> <p>Agree transportation routes and acceptable traffic patterns to minimise traffic nuisance during construction phase of the Project.</p>	Avoid or minimise risks and nuisance to local community.	Good Practice EBRD PR 4	Part of project implementation.	2021	Traffic Management Plan in place; forming part of the CESMP (see ESAP Item 1.4).	-
4.3	<p>Occupational Health & Safety (OHS) Management System</p> <p>Occupational Health & Safety (OHS) Management System, including a detailed <i>Occupational Health & Safety Management Plan</i>, to be developed for the project (based on MYTILINEOS Corporate Systems).</p>	<p>Minimisation of accidents and incidents and ensure a safe working environment and promote the health of workers and safe use of equipment.</p> <p>Improved and continual improvement of health and safety performance.</p>	Good Practice EBRD PR 4	Part of project implementation.	2021 - Ongoing	<p>OHS system and plans are in place and approved by the Project (MYTILINEOS and METKA).</p> <p>Regular project reporting within semi-annual environmental monitoring reporting; to include:</p> <ul style="list-style-type: none"> ▪ records of OHS training; ▪ records of safety meetings; ▪ accidents and near-misses. <p>The above records shall also be made available upon request, and during IESC Monitoring (see ESAP Item 1.7 and 1.8).</p>	OHS plan should include risk assessment; training requirements and plan; EHS operational control; PPE requirements; performance monitoring and reporting through the Contractors and Subcontractor chain.

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4.4	<p>Emergency Preparedness and Response Plan</p> <p>A comprehensive <i>Emergency Preparedness and Response Plan</i> to be developed for the Project, clearly setting roles and responsibilities.</p> <p>There should be sections developed to cover situations relating to:</p> <ul style="list-style-type: none"> ▪ containment of hazardous materials; ▪ oil and fuel spills; ▪ fire, gas leaks and explosions; ▪ work-site accidents; ▪ natural hazards (such as earthquakes and landslides); ▪ extreme weather conditions; and, ▪ COVID-19 outbreaks. 	Maximise effectiveness of response to emergencies; and minimisation of risks to workers and community health & safety,	Good Practice EBRD PR 4	Part of project implementation.	Ongoing	<p>Project-specific Emergency Preparedness and Response Plan is in place, consulted with, and as appropriate; approved by local Emergency Services and/or appropriate Competent Authorities.</p> <p>Records of Emergency Preparedness Response training and drills should be maintained.</p>	<p>Maintain current plans</p> <p>The Emergency Preparedness and Response Plan may form part of the wider AGIOS NIKOLAOS INDUSTRIAL COMPLEX plan; providing that the project-specific risks are fully integrated.</p>
4.5	<p>Community Health & Safety Management Plan</p> <p>A comprehensive <i>Community Health & Safety Management Plan</i>, which is specific to the project, shall be developed.</p> <p>This should include aspects of the <i>Traffic Management Plan</i> (ESAP Item 4.2) and <i>GBHV Policy</i> (ESAP Item 2.2); and <i>Emergency Preparedness and</i></p>	Integrated management of potential risks affecting Community Health & Safety; and integrating specific considerations from specific hazard	Good Practice EBRD PR 4	Internal Costs.	Ongoing	Submission of <i>Community Health & Safety Plan</i> to Lenders for review, and approval.	<p>Maintain current plans.</p> <p>The Community Health & Safety Management Plan may form part of the wider AGIOS NIKOLAOS INDUSTRIAL COMPLEX plan; providing that the project-specific risks are fully integrated.</p>

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	<i>Response Plan</i> (ESAP Item 4.4) – all considered in the context of their impacts on the Community, and measures to prevent those impacts.	management plans,					
PR5 Land Acquisition, Involuntary Resettlement and Economic Displacement							
5.1	Land Acquisition & Right of Way Access Associated with Overhead Transmission Lines (OHTL) Any land acquisition associated with the OHTLs is being sought via a 'willing buyer – willing seller' arrangement and negotiated settlement.	Management of land acquisition and right of way risks associated with the OHTLs.	National Requirements EBRD PR5	Internal Costs	Ongoing	Provide monthly report updates to Lenders with respect to negotiation progress.	Regular updates are required to keep Lenders informed on progress of land acquisition.
				Internal Costs	01 September 2021	Land Acquisition & Resettlement Framework (LARF) which will set out the approach for land acquisition to be followed by the Client in case of expropriation.	This shall include the preferred approach (willing buyer-willing seller); and indicate details of potential alternatives (such as, for example expropriation).
				Internal Costs	Prior to 1 st Disbursement; or prior to commencement of construction (e.g. civil works) of the	Letter to Lenders confirming the status of land acquisition.	In the event that Land Acquisition is complete via a 'willing buyer – willing seller' arrangement, a Statement shall be provided by the Client to confirm that the

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					OHTL (whichever is earliest).		process was in compliance with PR 5.
5.2	<p>Resettlement Action Plan (RAP) In the event that a 'willing buyer-willing seller' negotiation is not possible – a detailed <i>Resettlement Action Plan</i> (RAP) will be required.</p> <p>The RAP will outline the process to be followed by the Client, and shall be aligned with National Requirements, as well as EBRD Requirements (particularly PR5); and Good Practice relating to Resettlement.</p>	Minimisation of impacts of land acquisition and mitigation for the risks of permanent and temporary land acquisition and compensating for lost income and land (as applicable).	National Requirements Good Practice EBRD: PR 5	Third party consultant/ Project Company Internal Costs	<p>Prior to Construction (including civil and preparatory works) of the OHTLs;</p> <p><i>unless</i> a Legal Statement is provided to confirm that negotiations have been concluded on a 'willing buyer – willing seller' basis.</p>	Detailed Resettlement Action Plan (RAP) submitted to- and approved - by Lenders.	The RAP shall be prepared in accordance with EBRD PR 5.
					Within 3 months from fulfilment of all land take requirements, according to the RAP.	Completion Report provided to Lenders.	This shall demonstrate that the process was implemented in line with the RAP, in addition to any supplementary project documents such as the Stakeholder Engagement Plan (SEP), and – as a minimum - that no Affected Person was left worse off as a result of the project.
PR6 Biodiversity Conservation and Suitable Management of Living Natural Resources							

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6.1	<p>Overhead Transmission Lines (OHTL)</p> <p>The OHTL Environmental Impact Assessments (EIAs) conclude that there is no significant risk to biodiversity.</p> <p>Ongoing management of latent biodiversity risks is required – in accordance with general good practice principles - to ensure that significant impacts do not occur.</p>	Management of biodiversity risks associated with the OHTL.	EBRD PR6	Internal Costs	Prior to Commencement of OHTL Construction	<p>Undertake supplementary review of publicly available data; such as nearby wind farm developments; to augment the current biodiversity information relating to the OHTLs.</p> <p>Ensure designs include appropriate measure to reduce impact on avifauna.</p> <p>Ensure compliance with EU and National requirements as well as PR 6.</p> <p>Report to Lender as part of quarterly reporting and annual report.</p> <p>Commissioning audit to review compliance</p>	
PR8 Cultural Heritage							

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8.1	<p>Chance Find Procedure</p> <p>Ensure Contractors / Subcontractors adopt a <i>Chance Find Procedure</i> and report 'chance finds' to the authorities and other relevant authorities and institutions to undertake excavation and full archaeological assessment of the finds.</p> <p>All workers of Contractors / Subcontractors to receive induction training on the use of the Chance Find Procedure.</p>	Preservation of Cultural Heritage.	National Legislation EBRD PR8	Internal Costs.	During Construction	<p>Chance Find Procedure adopted by Contractors / Subcontractors.</p> <p>Report to the Lenders any Chance Find.</p>	
PR10 Information Disclosure and Stakeholder Engagement							

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10.1	<p>Stakeholder Engagement Plan (SEP)</p> <p>Implement the SEP and Grievance Mechanism.</p> <p>Nominate a person, responsible for SEP implementation and fore responses to grievances raised by stakeholders. Details of the nominated person, including experience and qualifications relevant to the task, are to be provided to the Lenders.</p> <p>Ensure the SEP and Non-Technical Summary (NTS) and appropriate environmental documentation is disclosed on the Project/Company website– in English and Greek – throughout the project life; and updated as necessary.</p>	<p>Need for good stakeholder engagement and disclosure of information.</p> <p>Tasks and responsibilities are clearly identified; reducing the risk of conflicts and ensuring good public relations.</p>	Good Practice EBRD PR10	Internal Costs	Ongoing	<p>SEP published on website and disclosed to affected Stakeholders.</p> <p>Documentation of stakeholder engagement activities.</p> <p>Grievance and suggestions log and resolution records</p> <p>SEP implementation results will be part of annual reporting to the Bank.</p>	<p>The Project will implement a plan for communication with Third Parties as well as workers and subcontractors and create mechanisms for feedback on concerns/issues raised by stakeholders. This will be in line with the Company existing practices</p>
10.2	<p>Corporate Social Responsibility (CSR), Corporate ESG Reporting & Disclosure</p> <p>MYTILINEOS will maintain a corporate CSR and ESG reporting and publish information on sustainability inclusive of key Performance Indicators; including providing information in line with EU Guidelines on reporting Climate-</p>	<p>Publish on information on operations, part of sustainability reporting.</p> <p>The EU guidance on climate related information can be</p>	EBRD PR 1 EU Directive on disclosure of non-financial information	Own/internal	Base year 2016 - onwards.	<p>Reporting strategy in place (Publish annual, sustainability or other relevant reports). Whilst the reporting may be made at MYTILINEOS (Corporate) level; this must include metrics relating to the Project</p>	<p>Aim to implement best practice on non-financial disclosure including climate related data</p> <p>MYTILINEOS since 1/1/2017 complies with the Law 4403/2016. The European Directive 2014/95 “Amending Directive</p>

No.	Action	Environmental Risk, Liability / Benefit	Legislative Requirement / EBRD / Good practice	Investment Needs / Resources Costs	Timetable Action to be Completed	Target and Evaluation Criteria for Successful Implementation	Comment
	<p>related information (and/or Best Practice as appropriate). Fully implement by 2023 the EU requirements on the Corporate Sustainability reporting Directives (CSRD) inclusive of EU Taxonomy disclosure requirements.</p> <p>Other metrics for reporting including: waste production; liabilities; Energy consumption; and Health and Safety including lost time due to injury as part of annual reporting or similar.</p> <p>The report will include information on water use/impacts; as well as Energy Efficiency measures and GHG emissions.</p>	<p>downloaded here https://ec.europa.eu/finance/docs/policy/190618-climate-related-information-reporting-guidelines_en.pdf</p> <p>EU draft CSRD</p>				<p>(Agios Nikolaos 826MW CCGT).</p> <p>2021 report onwards include the recommendation of the EU on climate related disclosure information</p> <p>From 2022 comply fully</p> <p>From 2023 implement fully CSRD inclusive of TCFD recommendations as requirements by EU law.</p>	<p>2013/34/EU as regards disclosure of non-financial and diversity information by certain large undertakings and groups” was transposed into Greek law by law 4403/2016.</p> <p>CSRD will include mandatory reporting on Taxonomy and climate related issues such as TCFD.</p>
10.3	<p>Publish EIAs for both OHTLs</p> <p>Update the project information website once the Project is completed and operational.</p>	Update disclosure materials.	Best practice	Internal	Post construction	Publication of EIAs, in English and Greek.	-