



**Bakhvi HPP**

**BAKHVI 2 LLC**  
**Gender Equity Policy**

This Compliance Policy is Approved by the Company Director: Giorgi Abramishvili

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## BAKHVI 2 LLC

### Gender Equity Policy

#### Introduction

Bakhvi 2 LLC (the “Company”) is a company developing Bakhvi 2 (Bakhvi 2a, Bakhvi 2b) hydro power plants in Guria, region of Georgia. Bakhvi 2 HPP consists of a series of small and medium-sized run-of-the-river plants, Bakhvi 2a and Bakhvi 2b HPP, located on the Bakhvistskali river in the Ozurgeti Municipality, near the village of Ukanava. Investors of the company include Caucasus Clean Energy Holding (CCEH), Austrian Investment fund ILAG, and other field-specific investors from Austria and Georgia. CCEH’s investors comprise well-known financial institutions from America and European countries (including European Investment Bank [EIB], Dutch Development Bank [FMO], Austrian Development Bank [OeEB], etc.). ILAG holds diverse business interests across several Western countries.

The construction of the Bakhvi 2 hydroelectric power station is being undertaken on the Bakhvistskali river, spanning elevations between 1,378 meters and 506 meters above sea level. The Bakhvi 2 HPP includes the development of two stations: Bakhvi 2a, with an installed capacity of 11.6 MW, and Bakhvi 2b, with an installed capacity of 23.8 MW.

The Bakhvi 2a station is a run-of-river hydroelectric power plant comprising a headworks structure, a pressure system, and an above-ground hydroelectric power plant building. The building will house all the electrical and mechanical equipment necessary for electricity generation. The pressure pipeline is being installed at the lower points of the slope on the right bank of the Bakhvistskali river. The total head of the power plant is 311.55 meters, with a design flow rate of 4.6m<sup>3</sup>/s. The average annual energy output is projected to be 45.5 GWh.

Bakhvi 2b is a run-of-river hydroelectric power plant that will comprise a headworks structure, a pressure system, and an above-ground power plant building. The pressure pipeline is being constructed on the left bank of the river. The total head of the power plant is 551.2 meters, with a design flow rate of 5.3m<sup>3</sup>/s. The average annual energy output is estimated at 92.8 GWh.

Bakhvi 2 LLC conducts its operations in compliance with the environmental and social management standards set by international financial institutions, including the IFC and EIB.

#### Purpose

Bakhvi 2 LLC is committed to advancing gender equality, eliminating gender-based violence, and fostering a workplace where all individuals, regardless of gender, can thrive equally. The Company acknowledges that the energy and hydropower sectors, including HPP operations, have historically been male-dominated.

Therefore, Bakhvi 2 LLC places special emphasis on supporting the inclusion, advancement, and equitable treatment of women across all levels of the organization.

This policy reflects the Company's alignment with international standards including the UN Global Compact Ten Principles, IFC E&S Performance Standards, EIB Environmental and Social Standards, the Sustainable Development Goal (SDG) 5 on Gender Equality, and Georgian Law on Gender Equality, which ensures equal rights and opportunities for men and women in political, economic, and social life, and the Labor Code of Georgia, which prohibits workplace discrimination and promotes equal pay and safe, inclusive employment practices.

#### Scope

This policy applies to all Bakhvi 2 LLC employees, contractors, management, and stakeholders, across all business operations and HPP sites. It addresses workforce representation, equal pay, career progression, and the prevention of gender-based violence.

The effectiveness of this policy is tracked by using key performance indicators (KPIs) outlined in the Annex 1: Gender Equality Key Performance Indicators. These KPIs form an integral part of our accountability framework and ensure measurable progress in line with SDG 5 and national equality goals.



### Gender Representation and Workforce Breakdown

To support fair representation and eliminate systemic gender bias, Bakhvi 2 LLC commits to the regular collection and monitoring of gender-disaggregated workforce data. This enables the Company to assess diversity trends, identify barriers, and guide strategies for inclusive talent development. Definitions and focus areas include:

1. Women in the Total Workforce: The proportion of female employees across the Company’s operations, reflecting overall gender inclusivity;
2. Women in All Management Positions: Representation of women in leadership roles at all levels (junior, middle, and senior management);
3. Women in Junior Management Positions: Share of women in entry-level managerial positions, supporting career pathways from early stages;
4. Women in Top Management Positions: Presence of women in executive and senior decision-making roles, emphasizing gender balance at the highest level;
5. Women in Revenue-Generating Positions: Inclusion of women in commercial, project, and business development roles directly linked to the Company’s value creation;
6. Women in STEM-Related Positions: Representation of women in science, technology, engineering, and mathematics roles, particularly relevant to hydropower operations.

As of the latest reporting period, Bakhvi 2 LLC’s management team consists of six members, of which two are women. Additionally, one member of the Company’s Board of Directors is a woman, demonstrating representation at the highest governance level.

The Company recognizes that women remain underrepresented in technical fields and leadership roles, as noted in international and regional assessments. To address this, Bakhvi 2 LLC incorporates workforce breakdown indicators into its talent planning, inclusive recruitment, leadership development, and promotion frameworks.

Bakhvi 2 LLC conducts quarterly workforce composition assessments, with special attention given to identifying and highlighting the representation of women from project-affected communities. The findings are presented to the Supervisory Board and used to inform HR strategies, ESG disclosures, and continuous improvement efforts. All data is managed in accordance with privacy and data protection laws.

### Gender Pay Equity and Transparency

Bakhvi 2 LLC supports a transparent and fair remuneration framework that promotes equal pay for work of equal value. While respecting the confidentiality of individual compensation, the Company takes steps to ensure that its salary structures and advancement criteria are free from gender bias. In line with the EU Directive on Pay Transparency, which promotes equal pay for work of equal value through transparency, employee access to pay information, and accountability measures, Bakhvi 2 LLC takes a proactive approach to identifying and addressing gender-based pay disparities through structured frameworks and regular internal review.

### Gender Pay Indicators and Transparency Commitment

To uphold the principles of pay equity and transparency, Bakhvi 2 LLC assesses its gender pay gap using the internationally accepted formula:

$$(Men’s Average Salary – Women’s Average Salary) / Women’s Average Salary$$

This indicator highlights the proportional difference between male and female average salaries and helps identify underlying inequities in compensation practices. For instance:

Category	Amount (GEL)
Average male salary	2,500
Average female salary	2,000
Gender Pay Gap (%)	25%

**Calculation:**  $(2,500 - 2,000) / 2,000 = 0.25$  or 25%

To ensure data accuracy and protect employee confidentiality, Bakhvi 2 LLC conducts this assessment using anonymized, aggregate data. Individual salaries are never published or disclosed. Internal HR professionals analyze results confidentially and initiate corrective action if unjustified disparities are found. The Company adjusts internal processes to reflect evolving pay equity standards.

If Bakhvi 2 LLC uses alternative statistical methods for internal analysis, results are recalculated using the standard formula above to ensure compatibility and transparency for external ESG disclosure purposes. This approach supports SDG 5 on Gender Equality, aligns with national labor laws on equal pay for equal work, and strengthens trust among employees and stakeholders.

### **Prevention of Gender-Based Violence and Harassment**

Bakhvi 2 LLC is committed to maintaining a work environment where everyone feels safe, respected, and valued. The Company takes a proactive and preventative approach to gender-based violence and harassment, grounded in international best practices, particularly ILO Convention No. 190 on Violence and Harassment in the World of Work and in full compliance with Georgian legislation on the protection and assistance of victims of domestic violence.

The Company fosters a workplace culture where unacceptable behavior is actively prevented, identified early, and addressed promptly. In support of this commitment, Bakhvi 2 LLC:

1. Maintains a safe and inclusive workplace free from all forms of gender-based harassment, intimidation, or violence, including that related to gender identity and sexual orientation;
2. Implements internal policies and clear, survivor-centered reporting procedures that guarantee confidentiality and protect those who come forward;
3. Ensures a structured, timely response process that includes thorough investigation, support services, and corrective measures, as appropriate;
4. Organizes mandatory employee training, awareness campaigns, and leadership engagement to strengthen positive behaviors and reinforce a respectful workplace.

All employees, contractors, and partners are expected to model respectful conduct and adhere to these standards. Violations will be addressed through defined disciplinary procedures and remedial action, consistent with the Company's Code of Conduct and national laws. This commitment is not standalone, it is integrated into Bakhvi 2 LLC's broader human resources framework, human rights due diligence, and stakeholder engagement practices. It contributes directly to Sustainable Development Goal (SDG) 5 on Gender Equality and reflects Bakhvi 2 LLC's values of dignity, equality, and zero tolerance for any form of abuse.

### **Gender Policy Review and Update Process**

In alignment with internationally recognized ESG frameworks and inclusive workplace principles, Bakhvi 2 LLC conducts a structured review of this Gender Policy on an annual basis. This ensures that the policy remains responsive to changing conditions, workforce dynamics, and stakeholder expectations.

The review process is led by the ESG manager in close cooperation with the Head of Administration. The purpose is to:

1. Reflect current gender representation data across roles and levels, along with up-to-date gender pay gap indicators, to support transparency and informed actions on equity goals;
2. Incorporate continuous improvements in the prevention, safe reporting, and effective resolution of gender-based violence and harassment, ensuring that all procedures are accessible, confidential, and aligned with best practices;
3. Ensure consistency with evolving standards including Sustainable Development Goal (SDG) 5 on Gender Equality; ILO Conventions such as Convention No. 100 on Equal Remuneration, Convention



No. 111 on Discrimination (Employment and Occupation), Convention No. 183 on Maternity Protection, and Convention No. 190 on Violence and Harassment; IFC Performance Standard 2 on Labor and Working Conditions; EIB Environmental and Social Standard 6 on Labour Rights and Standard 9 on Stakeholder Engagement; as well as Georgian national legislation including the Law on Gender Equality and the Labor Code of Georgia.

The proposed changes are reviewed and approved by the Company Director and then shared with the ESG and Sustainability Lead of Caucasus Clean Energy Holding for alignment with the broader ESG oversight framework. Once approved, the updated policy is communicated to the Supervisory Board and made publicly available on the Bakhvi 2 LLC website. Previous versions remain accessible in an archived folder for transparency and accountability.

## Annex 1: Gender Equality Key Performance Indicators (KPIs)

As part of Bakhvi 2 LLC's commitment to results-driven implementation of gender equity goals, the following KPIs serve as essential measurement tools. These indicators allow the Company to track progress toward gender equality objectives, meet national and international reporting requirements, and support continuous improvement. The annex helps translate policy into measurable outcomes, ensuring accountability and transparency.

<b>Representation</b>	% of women in total workforce	Quarterly	Head of Administration	Supervisory Board Presentation
	% of women in junior/mid/senior management	Quarterly	Head of Administration	Personnel on Board Document/Chart
	% of women in top leadership/governance roles	Quarterly	Director/ Head of Administration	Personnel on Board Document/Chart
	% of women in STEM-related roles	Annually	Head of Administration	Personnel on Board Document/Chart
	% of female employees from project-affected communities	Quarterly	Head of Administration /ESG	Supervisory Board Presentation
<b>Pay Equity</b>	Gender pay gap (mean calculation as per formula)	Annually	Head of Administration /Finance	Pay Disparity Statement
<b>Workplace Safety &amp; Inclusion</b>	# of gender-based violence and harassment incidents reported, investigated, and resolved	Quarterly	Head of Administration /ESG	Grievance Log/ Acknowledgment letter/Response letter
	# of Gender Base Violence and Harassment incidents documented in internal tracker	Quarterly	Head of Administration /ESG	Grievance Log/ Acknowledgment letter/Response letter
	# of employees trained on gender sensitivity and respectful workplace	Annually	Head of Administration /ESG	Training Log
	# of grievances or whistleblowing reports related to gender concerns received and addressed	Quarterly	Head of Administration /ESG	Grievance Log/ Acknowledgment letter/Response letter
	% of grievance cases resolved within agreed timeframes	Quarterly	Head of Administration /ESG	Grievance Log/ Acknowledgment letter/Response letter
	Date of last policy review/update	Annually	ESG	Document Tracker

<b>Policy &amp; Governance</b>	# of ESG/HR audit recommendations implemented on gender topics	Annually	Head of Administration /ESG	ESG/ Head of Administration /Holding/External Audit
	# of gender-focused policy or procedural updates made annually	Annually	Head of Administration	Annual ESG Report
	# of staff consultations held on gender-related issues	Annually	Head of Administration	Attendance Log
	# of policy improvements arising from grievance and audit feedback	Annually	Head of Administration /ESG	Annual ESG Report