

DOCUMENTATION FRONT SHEET



GEORGIA

ESMS – Environmental and Social Management System

Domus Fabrilis

**Bakhvi 1 Hydropower Plant Project
Environmental and Social Management System**

2025

Project Name: Project on the Construction and Operation of 10.9 MW Run-of-River Power Plant "Bakhvi 1 HPP" on Bakhvistkali River
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Abbreviations

Abbreviations	Description
CAPA	Corrective and Preventive Actions
CC	Construction Company
CSM	Construction Site Manager
E&S	Environmental and Social
EHSP	Environmental Health and Safety Plan
EIB	European Investment Bank
EO	Environmental Officer
ESG	Environmental and Social Governance
ESIA	Environmental and Social Impact Assessment
ESMM	Environmental and Social Mitigating Measures
ESMS	Environmental and Social Management System
GIIP	Good International Industrial Practice
HPP	Hydro Power Plant
HSE	Health Safety Environmental
HSES	Health, Safety, Environmental and Social
HSO	Health and Safety Officer
IFC	International Finance Corporation
ISO	International Organization for Standardization
LLC	Limited Liability Company
MoEPA	Ministry of Environment and Agriculture of Georgia
MW	Mega Watt
NHMP	Natural Hazards Management Plan
PDCA	Plan-Do-Act-Check
PM	Project Manager
PPE	Personal Protective Equipment
PPMP	Pollution Prevention Management Plan
ROW	Right of Way

1. Introduction

This document outlines the system components by which environmental and social aspects are managed for the construction phase of the project. The environmental and social management system has been designed with the following key features in mind:

- Environmental and social management is integrated into the project.
- The management system is multilevel and takes cognizance of the way the project is organized and structured.
- The management system is dynamic and can accommodate change and improvements.
- The environmental and social management components of the management system take advantage of elements which are common to project management and integrates with health and safety, project compliance, security, government and public affairs where appropriate.
- The management system enables transparent translation of Environmental and Social Impact Assessment (ESIA) commitments into action.
- The management system is consistent with the EIB and IFC E&S standards.
- The management system is consistent with Developer's internal requirements.
- The management system is comprehensive, addressing all environmental management issues. The contractor is responsible for the environmental direction, while the developer manages social issues.

2. Purpose and Scope

This ESMS is part of the overall management framework for the Project. Developed by the Domus Fabrilis LLC, it aligns with recognized management system standards to provide a framework for mitigating and monitoring environmental aspects and impacts during the construction phase of the Project.

This Manual demonstrates how Domus Fabrilis LLC intends to deliver the Project's environmental, health and safety legal compliance and other requirements and E&S commitments.

The ESMS provides guidance and direction for the implementation and operation of the ESMS to all Domus Fabrilis sub-contractors, particularly those concerned with ESMS related activities.

The ESMS also identifies a set of interrelated elements (organisational structure, planning activities, responsibilities, practices, procedures, and resources) used to establish and achieve the environmental performance objectives of the Project.

2.1 Scope of the Plan

The "Project's E&S standards" refers to the EIB Environmental and Social Practices and Standards and to the IFC Performance Standards.

The Project's "Applicable E&S Requirements" include:

- The Georgian national legislation related to environmental or social matters.
- All the norms, standards and discharge limit values defined in the Georgian national environmental or social regulations.
- IFC Performance Standards.
- EIB Environmental & Social Standards.

The following documents shall be referred to (and complied with, except for matters that are irrelevant to the Project, and for which compliance would have no positive E&S consequence and non-compliance would have no negative E&S impacts) by the Contractor to ensure compliance with the Applicable E&S Requirements:

- The IFC Environmental, Health, and Safety General Guidelines
- The IFC guidance note for Workers Accommodation

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- The EIB Environmental, Climate and Social Guideline on Hydropower Development

The ESMS – Environmental and Social Management System is intended to cover those activities described in the ESIA report and have to be updated once more information becomes available. It covers project activities during construction and will be subject to thorough reviews prior to the commencement of activities. The system reflects the mitigation and enhancement measures Domus Fabrilis LLC has committed to and includes desired outcomes; performance indicators; targets or acceptance criteria; monitoring and timing for actions and responsibilities. Domus Fabrilis LLC has principal responsibility for all measures outlined in the present document and may delegate responsibility to subcontractor, where appropriate. In cases where other individuals or organizations have responsibility for mitigation or enhancement measures, this is clearly indicated within [Annex 1](#).

3. Background

The project concerns the construction and operation of the 10.9 MW run-of-river hydropower plant “Bakhvi 1 HPP” on the Bakhvistkali River.

According to the project design, the hydropower potential of the Bakhvistkali River will be utilized within the Bakhvi 1 HPP project area. The project envisages the arrangement of a run-of-river hydropower plant, including the following main components:

- Headworks - intake, spillway and fish pass;
- Penstock;
- Powerhouse;
- Substation.

The construction and operation of the 10.9 MW Bakhvi 1 HPP is being carried out in accordance with the approved project documentation, applicable permits and the project schedule.

The project is executed and constructed by Domus Fabrilis LLC Construction company. The document below reflects the approach of Domus Fabrilis LLC towards Environmental, Health and Safety Performance.

The company’s activities are located in Ozurgeti Municipality, within the Bakhvistkali River valley, in the area associated with Bakhvi 1 HPP, including access roads, temporary construction areas and the main HPP facilities.

The construction scope includes the development and use of access roads leading to Bakhvi 1 HPP facilities, temporary construction infrastructure, primary and ancillary facilities, and related construction activities.

The scope of Bakhvi 1 HPP consists of the following main sections:

- Bakhvi 1 headworks, including intake, spillway and fish pass;
- 3,217 m low-pressure penstock;
- Bakhvi 1 powerhouse on the left bank of the Bakhvistkali River;
- Two bridges over the Bakhvistkali River, one near the Bakhvi 1 headworks and the second adjacent to the Bakhvi 1 powerhouse;
- 110 kV switchyard near the Bakhvi 1 powerhouse.

Bakhvi 1 Location:



4. Legislation and Standards

Domus Fabrilis LLC and subcontractors will conduct all of its construction activities in accordance of the following document:

- ✓ IFC and EIB performance standards.
- ✓ National legislation, that form a prevailing legal regime under Georgian law.
- ✓ Specific environmental standards and project specifications.

In addition to the above construction company created Environmental and Social Management System (ESMS) that will be overarching system that manages project construction activities. The ESMS system of the Construction Company (CC) is presented with the following plans:

1. ESMS – Environmental and Social Management System
2. Workers Grievance Mechanism;
3. Emergency Preparedness Plan;
4. Health & Safety Management Plan;
5. Traffic Management Plan;
6. Community Health, Safety Management Plan;
7. Open Air Quality Management Plan;
8. Noise & Vibration Control Plan;
9. Erosion, Soil & Vegetation Management Plan;
10. Natural Hazards Management Plan (NHMP);
11. Effluent and Waste Management Plan;
12. Pollution Prevention and Control Plan
13. Material Management and Spoil Disposal Plan;
14. Site Waste Management Plan;
15. Confined Areas Air Quality Management Plan;
16. Quarry and Borrow Areas Management Plan;
17. Security Forces Management Plan;
18. Site Decommissioning and Rehabilitation Plan

5. ESMS Principles and Elements

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5.1 General Requirements

This Manual covers the construction phase of the project. It addresses each element of the management system as per EIB and IFC E&S standards. The documentation that supports the general descriptions given in this Manual is identified and cross-references are provided. This supporting documentation provides the mechanism by which the management system elements are implemented.

The primary function of the system is to ensure that the commitments which have been made in the ESIA as well as Georgian State Law requirements relating to construction are implemented by the contractor

In detail, the ESMS will provide the structure for:

- Managing the activities in a way ensuring continual improvement in environmental and social performances and compliance with applicable requirements.
- Establishing and assessing performances against its commitments.
- Setting environmental objectives and targets and following developer's policy in social aspects.
- Developing and effectively implementing appropriate plans and procedures in order to properly address environmental issues during site activities.

5.2 Purpose of the ESMS

This Manual demonstrates how the contractor intends to deliver the Project's health, safety and environmental (HSE) legal compliance and other requirements and ESG commitments.

The ESMS provides guidance and direction for the implementation and operation of the ESMS to all employees of the contractor, particularly those concerned with ESMS related activities.

The ESMS also identifies a set of interrelated elements (organizational structure, planning activities, responsibilities, practices, procedures, and resources) used to establish and achieve the environmental performance objectives of the Project.

5.3 Planning

5.3.1 Environmental and Social Aspects

The assessment process constitutes a systematic approach to the evaluation of the project in the context of the natural, socio-economic, and regulatory environment in which the development is proposed.

As the Project progresses, Domus Fabrilis LLC acknowledges that additional environmental issues may arise. The contractor is committed to continuously identifying and addressing environmental objectives, while the developer focuses on managing social aspects and maintaining comprehensive records of this ongoing process.

The contractor's requirements are meticulously crafted to proactively seek sustainable opportunities for continuous improvement. Our primary objective is to mitigate adverse impacts on the environment, security, health, and safety of workers, as well as local communities, throughout all phases of construction and operation of the project. This commitment includes implementing comprehensive environmental management practices to minimize ecological footprint and preserve natural habitats. We prioritize the safety and well-being of our workforce through stringent health and safety protocols, ensuring a secure working environment. Furthermore, we engage with local communities to understand their needs and concerns, fostering positive relationships and contributing to socio-economic development initiatives. By adhering to these principles, we aim to achieve sustainable development goals while upholding ethical standards and regulatory compliance.

5.3.2 Social Aspects

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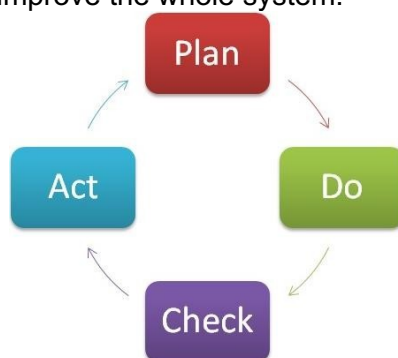
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Social aspects and impacts will be assessed in project specific working plans and include the following broad issues:

- Grievance Management
- Local Content (including local employment)
- Protection of archeology and natural resources
- Compensation for land use (accesses)
- Compensation for damage
- Opportunities for training and local workforce

5.3.3 Planning Process

Based on the PDCA cycle, EIB and IFC E&S standards provide a framework and specifies the most important requirements to identify, control and monitor the environmental and social aspects of the organization, and how to manage and improve the whole system.



The four steps in the cycle are as follows:

Plan: Establish the objective and processes needed to achieve the organization's ESG Policy.

Do: Implement the procedures and processes which are defined by the ESMS system.

Check: Monitor and measure the implemented process.

Act: Take action on the reported results to ensure that the implemented process has met the ESMS requirements, which maintains and continually improves the ESMS.

The planning process outlined above commences with the identification (or, if previously identified, updating) of environmental and social aspects.

5.4 The ESIA Process

The Bakhvi 1 HPP project adheres to the Environmental and Social Impact Assessment (ESIA) process, where it has identified its environmental and social aspects and impacts. Significant potential impacts were identified and thoroughly analyzed during this process, leading to the formulation of appropriate mitigation measures. It is the responsibility of the contractor to ensure compliance with the ESIA document throughout the project implementation.

To identify project aspects, all proposed activities, have been considered in terms of their direct or indirect potential to:

- Breach relevant policy, legal and administrative frameworks including and national legislation, relevant international legislation, standards and guidelines, and corporate environmental policy and management systems.

- Interact with the existing natural environment including its physical and biological elements.
- Interact with the existing socio-economic environment.

Activities assessed during site preparation, construction and reinstatement:

- Planned routine activities.
- Planned but non-routine activities.
- Unplanned or accidental events.

A summary of those Bakhvi HPP project activities that are predicted to result in significant environmental and social impacts, during the construction phase is:

- Haulage
- River diversion
- Road construction
- ROW clearance
- ROW preparation
- Trenching
- Pipe laying
- Backfilling
- Temporary reinstatement
- Final reinstatement
- Hydrotesting
- Waste generation
- Batching plant activities
- Tree cutting
- Transportation (using community roads as access roads for the projects)

Mitigation measures have been developed for each of the impacts to accentuate any positive benefits and to minimize or avoid any negative impacts. Impacts that could not be fully mitigated are termed “residual”. Additionally, potential impacts and subsequent mitigation measures which are geographically specific have been included in the ESIA.

The Environmental management plans describe in detail how the contractor will actually implement the mitigation measures.

All contractors’ employees shall be trained in the aspects and residual impacts via general induction training (which contains an environmental and social component).

5.4.1 Legal and Other Requirements

Domus Fabrilis LLC develops a procedure to identify all relevant regulations, codes of practice and guidelines that are applicable to the environmental and social aspects of its activities, products and services; and maintain access to all legal requirements that are relevant to its activities, products and services.

The purpose of the procedure is to achieve regulatory compliance in ISO 14001:2015 i.e. ensure that

appropriate actions are put in place to maintain compliance with regulatory requirements and that necessary license, authorisation and permit are obtained in due course as the Project progresses. Domus Fabrilis LLC will record this information in the 'Register of Legal and Other Requirements'.

The standards set forth in the international treaties are considered an integral part of the respective host governments' national legal system and take precedence over national legislation – to the extent such national legislation is inconsistent, with the exception of the Constitution.

Environmental and social legal and other requirements that apply to individual activities are referenced within the related management plans and supporting documentation.

Following environmental laws of Georgia were considered during the environmental impact assessment process (see the table below):

Year	Law	Registration code	Final version
1994	Law of Georgia on Soil Protection	370.010.000.05.001.000.080	11/02/2021
1994	Law of Georgia on Roads	310.090.000.05.001.000.089	15/07/2020
1995	Constitution of Georgia	010.010.000.01.001.000.116	29/06/2020
1996	Law of Georgia on Environmental Protection	360.000.000.05.001.000.184	28/06/2023
1997	Law of Georgia on Wildlife	410.000.000.05.001.000.186	29/06/2023
1997	Law of Georgia on Water	400.000.000.05.001.000.253	30/06/2023
1997	Maritime Code of Georgia	400.010.020.05.001.000.212	15/05/2024
1999	Law of Georgia on Protection of Air Quality	420.000.000.05.001.000.595	16/06/2023
2003	Law of Georgia on Red List and Red Book of Georgia	360.060.000.05.001.001.297	30/11/2023
2003	Law of Georgia on the Conservation of Soils and Restoration and Improvement of Their Fertility	370.010.000.05.001.001.274	30/06/2023
2005	Law of Georgia on Licenses and Permits	300.310.000.05.001.001.914	15/05/2024
2000	Law of Georgia on Regulation and Engineering Protection of the Sea shores, Reservoir and River Banks	400.010.010.05.001.000.830	07/15/2020
1997	Law of Georgia on Public Health	470.000.000.05.001.000.304	21/02/2024
2007	Law of Georgia on Cultural Heritage	450.030.000.05.001.002.815	30/11/2023
2014	Law of Georgia on Public	140070000.05.001.017468	07/05/2018

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	Safety		
2014	Waste Management Code	360160000.05.001.017608	03/17/2022
2017	Law of Georgia on Environmental Assessment Code	360160000.05.001.018492	30/11/2023
2020	Law of Georgia on Forest Code of Georgia	390000000.05.001.019838	30/11/2023
2021	Law of Georgia on Environmental Responsibility	360150000.05.001.020241	29/06/2023

Following environmental standards were used in the process of evaluating the quality of environmental objects (soil, water, air) (see the table below):

Date	Title of the Normative Document	Registration code
31/12/2013	Technical Regulation – “Protection of Surface Water Contamination”, approved by the decree №425 of the Government of Georgia.	300160070.10.003.017650
31/12/2013	Technical Regulation – “Methods of calculation of maximum permissible emission of hazardous substances into ambient air”, approved by the order №408 of the Government of Georgia	300160070.10.003.017622
28/09/2021	Technical Regulation – “on water protection zones”, approved by the order №440 of the Government of Georgia.	300160070.10.003.023033
31/12/2013	Technical Regulation – “Methods of calculating the actual amount of emissions according to instrumental methods for determining the actual amount of emissions in ambient air from stationary sources of pollution, list of special measuring and controlling equipment for determining the actual amount of emissions in ambient air from stationary sources of pollution and technological processes from stationary pollution sources,” approved by the order №435 of the Government of Georgia	300160070.10.003.017660
02/10/2014	Technical Regulation - provisions on "Determining Levels of Soil Fertility" and "Soil Conservation and Fertility Monitoring", approved by the decree №415 of the Government of Georgia.	300160070.10.003.018202
29/05/2018	Technical Regulation - "Topsoil Removal, Storage, Use and Cultivation", approved by the decree №424 of the Government of Georgia.	300160070.10.003.020597
28/05/2018	Technical Regulation - "The unfavorable weather conditions for Protection of Environment", approved by the decree №8 of the Government of Georgia.	300160070.10.003.020569

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26/10/2021	Technical Regulation - "Method for inventory of Stationary Sources of Air Pollution", approved by the decree №42 of the Government of Georgia.	300160070.10.003.023074
10/01/2014	Environmental Technical Regulation – approved by the decree №17 of the Government of Georgia.	300160070.10.003.017608
09/08/2022	The technical regulation on the approval of the "Rule of monetary compensation for damage to the environment" was approved by the Resolution N368 of the Government of Georgia.	300160070.10.003.023630
15/01/2014	Technical Regulation – “Maximum Allowed Concentrations of harmful substances at work places”, approved by the order №70 of the Government of Georgia	300160070.10.003.017688
15/01/2014	Technical Regulation on "Drinking Water", approved by the decree №58 of the Government of Georgia.	300160070.10.003.017676
17/02/2015	„The Rule of Implementation of State Control by the Environmental Supervision Department of Subdivision Agency of the Ministry of Environment and Natural Resources Protection of Georgia”. Approved by the decree №61 of the Government of Georgia.	040030000.10.003.018446

04/08/2015	"Rules of reviewing and coordinating the company's waste management plan". Approved by the decree №211 of the Minister of Environment and Natural Resources Protection of Georgia.	360160000.22.023.016334
17/08/2015	“Determination and classification of the list of waste according to their types and characteristics”. Approved by the decree №426 of the Minister of Environment and Natural Resources Protection of Georgia.	300230000.10.003.018812
11/08/2015	Regulation №422 of the Georgian government on Form and Content of. Conducting Waste Recording and Reporting dated by August 11, 2015.	360100000.10.003.018808
29/03/2016	Technical regulation on “Waste Transportation Rule” approved by. №143 of the of the Government of Georgia (March 29, 2016, Tbilisi).	300160070.10.003.019208
29/03/2016	Government Resolution №144 (March 29, 2016, Tbilisi) “On the Rules and Conditions for the Registration, Transportation, Pre-Treatment and Temporary Storage of Waste”.	360160000.10.003.019209
29/03/2016	Technical Regulation on №145 (March 29, 2016) of the Government of Georgia on Approval of Technical Regulations on Special Requirements for Hazardous Waste Collection and Treatment	360160000.10.003.019210
04/05/2017	Regarding the approval of the technical regulation "On the procedure for collecting and processing municipal waste" on amending the Resolution No. 159 of the Government of Georgia of April 1, 2016	300160070.10.003.019934
15/08/2017	Technical Regulation of the Government of Georgia "On Acoustic noise limits for rooms/premises in residential houses and public	300160070.10.003.020107

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	establishments and their accommodation. Resolution №398.	
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5.4.2 Environmental and Social Objectives

Specific objectives have been developed for Domus Fabrilis LLC to ensure comprehensive environmental, health, safety, and social performance throughout the hydro power plant (HPP) project:

1. The management plan will be regularly reviewed and updated as necessary to reflect evolving project needs and regulatory requirements.
2. Domus Fabrilis LLC is committed to minimizing environmental incidents during the construction phase of the HPP through proactive measures and adherence to environmental management protocols.
3. Corrective actions and non-conformances will be systematically generated, tracked, and addressed using a compliance tracking system. These actions will align with the Environmental, Social, and Governance (ESG) annex of the agreement signed between the developer and the contractor.
4. All HSES (Health, Safety, Environment, and Social) staff members will undergo specialized environmental competency training to enhance their skills in environmental management practices and compliance.
5. As part of their induction process, all contractors' staff will receive comprehensive environmental awareness training. This training aims to ensure that contractors understand and comply with environmental standards and project-specific requirements.
6. Domus Fabrilis LLC is committed to demonstrating compliance with all environmental, health, safety, and social commitments upon request from relevant stakeholders, regulatory authorities, or the developer.
7. All HSES staff members will receive thorough health and safety induction training to familiarize themselves with site-specific hazards, safety procedures, and emergency protocols.

5.5 Implementation and Operation

5.5.1 Structure and Responsibility

The responsibilities for the Bakhvi LLC ESG Team include:

- Preparation and maintenance of the Environmental and Social Plan, and activities scoping and scheduling.
- Compliance reporting against Environmental and Social commitments
- Set-up and direction of audit program, as well as carrying out audits.
- Set up and direction of Reporting Program.
- Set-up and direction of Training Program.
- Carry out and input to Toolbox training on significant Environmental issues.
- Review relevant Method Statements.
- Technical support to the delivery of the ESIA Approval Conditions.
- Develop and maintain the Commitment Compliance Tracking System.
- Implement requirements of Ecological Management Plan.
- Implement requirements associated with forestry management.

In addition, the Developer Management Plans and related documentation detail personnel responsible

for managing specific issues associated with those issues/topics. All employees also have responsibility for environmental and social management. This is achieved through trainings and the relevant information provided for the employees.

5.5.2 Roles and Responsibilities

For the implementation of Bakhvi 1 HPP, Domus Fabrilis LLC has designated responsible personnel. The tentative roles and responsibilities of these personnel are presented below:

5.5.2.1 Domus Fabrilis LLC Project Manager (PM)

- Will have ultimate responsibility for the site's site activities and will be responsible for implementation of the "Bakhvi 1 HPP";
- Will hold the ultimate responsibility for overseeing on-site activities and ensuring the successful implementation of both the "Bakhvi 1 HPP";
- Will ensure that input is solicited from all specialists in environmental, health, and safety matters;
- The project manager will oversee the management of relationships with external environmental organizations/agencies and the general public in accordance with the ESG annex of the agreement between the developer and the contractor.
- Will maintain full communication with the Project, providing updates both verbally and in writing regarding any legal, technical, environmental, health, safety, or social-related issues.

5.5.2.2 Domus Fabrilis LLC Construction Site Manager (CSM)

- Will be responsible for ensuring that all site personnel, including sub-contractors that work for Contractor, are informed of this document;
- Will designate personnels to serve as the Front-Line Employees/ Supervisors responsible for the implementation of the ESMS;
- Will be responsible for supervising the job performance of the environmental, health, and safety team;
- Will ensure that any incident to flora and fauna are reported and dealt with effectively;
- Will review the site-specific procedures and documents written by the subcontractor to guide the implementation of the ESMS;
- Will ensure that all consents/licenses are in place prior to performing ESMS techniques.

5.5.2.3 Domus Fabrilis LLC Environmental, Health, and Safety Manager (HSE)

HSE Manager Is responsible for coordinating and overseeing all HSE activities on-site. This involves implementing and monitoring policies, procedures, and practices to ensure a safe working environment for all personnel.

HSE Manager:

- Ensures that all activities related to the Environmental and Social Management System (ESMS) are conducted safely and in accordance with established standards and regulatory requirements. This includes overseeing environmental protection measures, waste management, and adherence to environmental permits.

- Conducts continuous monitoring of HSE performance to identify potential hazards, assess risks, and implement corrective actions as necessary. This proactive approach helps mitigate risks and prevent incidents.
- Is accountable for ensuring compliance with the project's health and safety plan. This involves regular reviews, updates to procedures, and communication of safety requirements to all personnel and subcontractors.
- Actively participates in daily toolbox meetings to reinforce the importance of safety practices among all team members. These meetings serve as opportunities to discuss safety procedures, address concerns, and promote a safety-conscious culture on-site.

5.5.2.4 Health and Safety Officer (HSO)

- Conducts thorough risk assessments pertaining to environmental management activities, identifying potential hazards such as terrain instability, chemical exposures, and risks associated with machinery and equipment.
- Implements safety protocols and procedures specific to workers involved in environmental management, including guidelines for safe equipment operation, handling of materials, and accident prevention.
- Provides training to project staff on safe practices for environmental management activities, ensuring competency in hazard recognition and mitigation strategies.
- Monitors the health impacts of activities on workers and nearby communities, assessing risks such as respiratory hazards and promoting adherence to hygiene practices and personal protective equipment use.

5.5.2.5 Environmental Officer (EO)

- Conducts comprehensive risk assessments related to environmental management activities, identifying potential hazards such as chemical exposures, ecosystem disturbances, and risks associated with operational processes.
- Implements robust environmental management protocols and procedures tailored to ensure compliance with regulations and minimize environmental impacts. This includes developing strategies for pollution prevention, waste management, and resource conservation.
- Provides training and guidance to project personnel on environmental best practices, fostering a culture of environmental stewardship and ensuring compliance with environmental policies and procedures.
- Monitors environmental performance and conducts regular audits to assess compliance with environmental standards and regulatory requirements. This involves analyzing data on air and water quality, waste management practices, and biodiversity conservation efforts.

5.5.2.6 Domus Fabrilis LLC Foreman

- Carry out toolbox talks;
- Ensuring that personnel involved in operations adhere to safety rules and regulations;
- Ensuring that all personnel are wearing PPE;
- Ensure all personnel are trained and competent in the work they conduct;
- Ensuring that all related activities are certified;

- Attention will be given to spill prevention and waste management;
- Ensure that all site-specific recommendations are strictly adhered to;
- Ensure that a pre-clearance checklist is reviewed and signed on site prior to work commencing.

5.5.3 Environmental and Social Management System Components

The ESMS will be documented, implemented and kept updated. Key components of the ESMS are:

E&S Policy, Environmental and Social Aspects (which have significant impacts on physical and social environment) and Impacts;	• Environmental & Social Forms and Records;
• Defined legal and other requirements; • Environmental and Social Objectives/ Targets (which are measurable, practicable and also consistent of the E&S Policy) and Planning Program(s) to Achieve Them; • Resources, roles and responsibilities (which are supported with defined internal and external communication); • Competence, Training and Awareness; • Environmental and Social Procedures Plans;	• Emergency preparedness and response; • Regularly monitoring and measurement of key characteristics of activities and services significant environmental and social impacts; • Compliance check against commitments and legal/other requirements; • Nonconformity and corrective actions (to mitigate environmental and social impacts); and

5.5.4 Training, Awareness and Competence

The contractor provides to all personnel engaged on the Project, an environmental and health and safety approved training program that communicates to them the contents of each Management Plan and ensures that all personnel are aware of their environmental and health and safety responsibilities.

The environmental and health and safety training program will aim to ensure that all site personnel fully understand:

- The environmental and health and safety requirements of the Project and how they will be implemented and monitored on site.
- The potential impacts of the Project, the mitigation measures that have been adopted to address those impacts and how and where to apply these measures.
- The environmental and health and safety sensitivities of the areas through which the penstock and other facilities will be constructed.
- The procedures to be followed in the event of a non-compliance with the environmental or health and safety requirements.
- How to deal with unforeseen environmental incidents; and

- The requirements set forth in these plans.

Domus Fabrilis LLC will ensure that all construction personnel attend regular site-specific ‘toolbox’ training sessions on environmental and social issues throughout the term of the contract.

Domus Fabrilis LLC will keep records of the training that has been provided to each person working on the Project.

The environmental and social training program will include a worksite induction for delivery to all site personnel before they carry out any work on the worksites.

5.5.5 Communication

5.5.5.1 Key Responsible Staff

Both internal and external communications on environmental and health and safety issues will be managed by Domus Fabrilis LLC environmental and health and safety managers.

The contact details of the environmental and health and safety managers (or a contact platform) will be made publicly available to allow a transparent communication line between Domus Fabrilis LLC and internal and external stakeholders.

Domus Fabrilis LLC will establish clear, formal procedure for both internal and external communication during the construction and operation phases.

5.5.5.2 Internal Communication

Domus Fabrilis LLC will set up a system to allow its employees and contractors (including sub-contractors, temporary staff and remote workers) to be consulted on a range of matters. This will ease internal communication and will allow to feedback any relevant information likely to affect the Domus Fabrilis’s operation and integrity / reputation, and its relations with third parties.

The environmental and health and safety managers will be responsible for receiving and recording complaints and contacting the complainants. Concerns associated with environmental and health and safety issues will be notified to the Management Representative through monthly complaints reports. Additionally, internal communication issues will be discussed during periodic Management Review Meetings.

5.5.5.3 External Communication

The environmental and health and safety manager will be the main point of contact for the various ministries, authorities and municipal representatives, and will manage all communications related to HSE issues (including permitting). Any important information gathered by the HSE Manager will be communicated to Domus Fabrilis LLC staff and, as appropriate, to the construction contractors and sub-contractors.

5.5.6 Environmental Management System Documentation

This ESMS Manual has been developed as a guide to the core elements of the ESMS and how they relate to each other.

For each element of the ESMS, a list of related documentation is provided as a means of “signposting” relevant information via references to the documents themselves.

In addition to the references contained within this Manual, there is a Documentation Register, which lists

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all relevant environmental and social documentation.

ESMS Documentation registers:

- ESMS – Environmental and Social Management Plan
- Worker's Grievance Mechanism
- Emergency Preparedness Plan
- Health & Safety Management Plan
- Traffic Management Plan
- Community Health, Safety Management Plan
- Open Air Quality Management Plan
- Noise & Vibration Control Plan
- Erosion, Soil & Vegetation Management Plan
- Natural Hazards Management Plan (NHMP)
- Effluents and Waste Management Plan
- Pollution Prevention & Control Plan
- Material Management and Spoil Disposal Plan
- Site Waste Management Plan
- Confined Areas Air Quality Management Plan
- Quarry and Borrow Areas Management Plan
- Security Forces Management Plan
- Site Decommissioning and Rehabilitation Plan
- Local Recruitment Plan
- Chance Find Procedure

Procedures:

- Refueling Procedure
- Spill Response Procedure

Monthly Reports

- Complaints Registry
- Spill Register
- Environmental Monitoring Records (Noise, Vibration, Soil)
- Monthly Waste Record
- Toolbox Talks
- Incident Report
- Checklist
- Environmental and Social Photos

In accordance with the ESMS documentation a copy of the ESMS Manual and related documents, including the Reporting Program, Training Program and Auditing Program, will be provided to sub-

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contractor prior to its implementation. These documents are also maintained in electronic format. The Commitment Compliance Tracking Registry is in place to maintain control of compliance data.

5.5.6.1 Site Decommissioning and Rehabilitation Plan

The contractor's Site Decommissioning Plan for the Bakhvi HPP Project outlines the steps necessary for the responsible closure and restoration of construction sites. This plan includes a comprehensive assessment of the site, implementation of environmental protection measures, dismantling and removal of temporary structures and equipment, effective waste management, and hazardous materials handling. The contractor will stabilize and restore the terrain, replant native vegetation, and rehabilitate soils as necessary. Ongoing monitoring and compliance reporting will ensure the effectiveness of these measures. Final inspection and handover will be conducted with relevant stakeholders, followed by long-term monitoring to ensure the site's ecological recovery.

5.5.6.2 Site Waste Management Plan

Domus Fabrilis LLC will prepare a Waste Management Plan and will be responsible for its implementation. Domus Fabrilis LLC will regularly review the plan as part of the Project's established documented information review process.

The Waste Management Plan will identify the procedures required to deliver an effective, proportionate response to any releases of pollution.

The Waste Management Plan may include the following:

- Introduction
- Company Information
- Brief Information of the Company's Activities
- Waste Management Plan During the Operations of Domus Fabrilis LLC
- Waste Generated During Company's Activity
- Waste Management Measures
 - Measures for Waste Prevention and Recovery
 - Accounting and Reporting of Generated Waste
 - Collection, Placement and Labelling of Generated Waste
 - Methods and Conditions for Temporary Waste Storage
 - Waste Transfer and Transportation Rules
 - Waste Treatment/Final Disposal
 - General Requirements for Safe Handling of Waste
 - Safety Measures and Prevention of Possible Emergency Situations During Waste Management
 - Responsibility for the Implementation of Waste Management Plan

It is a requirement of the Project to adhere to the laws and regulations of Georgia and Good International Industrial Practices (GIIPs). Therefore, the content of the HPP's Waste Management Plan will ensure that all legal and regulatory requirements are met.

Mitigation measures to be implemented by the Domus Fabrilis LLC to minimise possible traffic impacts of the Project will be presented in this Section.

5.5.6.3 Pollution Prevention Management Plan

The Pollution Prevention Management Plan (PPMP) documents the measures that are required to avoid

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and minimize pollution during project activities and to respond to any pollution incidents that occur. Specifically, the PPMP addresses the following areas:

- fuel storage and handling.
- protection of surface and groundwater.
- controlling dust and other emissions to air.
- controlling noise.
- spill prevention and control.

5.5.6.4 Community Health and Safety Management Plan

Domus Fabrilis LLC will prepare a Community and Occupational Health and Safety Management Plan and will be responsible of its implementation. The company will regularly review the Community and Occupational Health and Safety Management Plan as part of the Project's established documented information review process.

The Community and Occupational Health and Safety Management Plan will set out a formal system by which Domus Fabrilis LLC can manage and implement mitigation measures that will avoid or reduce the significance of impacts related to community health and safety, and also worker's occupational health and safety management.

The Community and Occupational Health and Safety Management Plan may include the following:

- identification and assessment of Project-related risks and adverse impacts to health and safety of the potentially affected communities;
- identification of health and safety risks and implementation of protection measures appropriate to the stage, size and nature of the Project, in line with legal requirements, Occupational Health and Safety Standards and GIIP;
- development of protection, prevention and mitigation measures proportionate to the impacts and risks to community and occupational health and safety;
- cooperation strategies with the relevant authorities and other stakeholders;
- clear definition of roles and responsibilities between Domus Fabrilis LLC, contractors and external stakeholders;
- Project-specific health and safety plan;
- appropriate supervision to ensure adequate implementation, maintenance and enforcement of the health and safety measures;
- monitoring of workers' health;
- roles accountable for implementation of this plan;
- risk assessment procedures where specific risks are identified with certain work activities.

It is a requirement of the Project to adhere to the laws and regulations of Georgia, Good International Industrial Practices (GIIPs) and relevant international standards. Therefore, the content of the Community and Occupational Health and Safety Management Plan will ensure that all legal and regulatory requirements are met.

This plan will describe mitigation measures to be implemented by Domus Fabrilis LLC and its contractors to minimise potential impacts of the Project on community and occupational health and safety.

5.5.6.5 Erosion, Soil & Vegetation Management Plan

The Erosion, Soil & Vegetation Management Plan developed by Domus Fabrilis LLC is integral to ensuring environmental stewardship during all phases of hydro power plant construction. This plan meticulously assesses potential erosion and sedimentation risks, taking into account project-specific

factors such as topography, climate conditions, soil characteristics, and nearby water bodies. The contractor's approach includes implementing robust erosion control measures to meet and exceed regulatory requirements and project specifications. By identifying areas prone to erosion and offering tailored mitigation strategies, we aim to safeguard environmental integrity and uphold sustainable construction practices throughout the project lifecycle.

5.5.6.6 Emergency Preparedness Plan

These procedures apply to the hydro power plant project location and all activities/services conducted by Domus Fabrilis LLC.

- Domus Fabrilis LLC shall ensure that the procedure is followed at site offices storage areas and working areas.
- The procedure must identify potential environmental accidents and health and safety emergency situations specific to hydro power plant sites and associated facilities. It should clearly define responsibilities for response and outline the necessary equipment and resources required for intervention.
- Detailed plans and procedures within the document should focus on managing, preventing, and mitigating identified accidents and emergency situations. Additionally, measures should be included to address potential adverse environmental and social impacts.
- Domus Fabrilis LLC is accountable for regularly reviewing and updating its emergency preparedness and response plans and procedures, particularly following any accidents or emergency incidents.
- Domus Fabrilis LLC should conduct periodic testing of the procedure and assess the readiness of its employees and contractors, wherever feasible.

5.5.6.7 Traffic Management Plan

This plan applies for all operations performed by contractor in the project of Bakhvi HPP that relates to vehicle movement and may interrupt the normal traffic flow of a roadway and/or road-of-way, sidewalks, and alleys.

The plan refers to following issues:

- Access Control;
- Prescribed Routes;
- Loading/Unloading Areas;
- Parking Areas;
- Garaging and Vehicle Maintenance Areas;
- Refueling Areas;
- Pedestrian Crossings;
- Speed Limit;
- Road Signs and Markings;
- Controlling traffic flows by flagmen;
- Road Obstructions;
- Icing of Roads;
- Collision Protection;

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- Lighting.

5.5.6.8 Local Recruitment Plan

The implementation of the Local Recruitment Plan by Domus Fabrilis LLC is crucial in adhering to the document prepared by the developer and maximizing local employment opportunities. This plan emphasizes skills development and training initiatives aimed at equipping local communities with the necessary competencies to secure employment both during and after project completion. Domus Fabrilis LLC ensures fair job distribution, prioritizes local hiring, and supports sustainable socio-economic growth in the project area as outlined in the developer's document. By investing in skills development and fostering employment prospects, we aim to cultivate a skilled workforce and contribute positively to the long-term prosperity of local communities

5.5.7 Operational Control

These System Procedures cover the management and control of both the ESMS and the principal environmental and health and safety, which the system manages. The present procedure applies to all the processes and activities covered under the scope of ESMS.

Domus Fabrilis LLC will need to consider the following when developing the procedure:

- Operational control procedures are applicable to contractors/suppliers of Domus Fabrilis LLC.
- Operational control procedures should be written in sufficient detail to provide the necessary level of instruction to ensure the desired outcome. Consideration may be given to the experience, education, and / or training of the person(s) who are executing the instructions. A 'Master List of Operation Control Procedures' will be maintained and available to all relevant parties.
- The ESMS Team should review the operational control procedures annually or more frequently if needed, to ensure that the operational control procedures meet ISO 14001:2015.
- Domus Fabrilis LLC should control planned changes and review the consequences of these changes to existing operational control procedures. Domus Fabrilis LLC should take action to mitigate any adverse effects, when identified.
- All documented information pertaining to operational planning and control will follow the "Control of Documented Information Procedure".
- Domus Fabrilis LLC to undertake specific training to communicate about operational planning and control requirements (implementation of procedures). The trainings required will be detailed in the "Competence, Training and Awareness Procedure".

5.5.7.1 Management of Change

Changes in the project may arise due to unforeseen circumstances. Adaptive changes during construction activities will entail implementing a formal procedure to manage these changes, applicable to all project activities.

The objective of this procedure is to ensure that the impacts of changes on workers' labor and working conditions, the environment, and the socio-economic conditions of communities are identified and assessed before implementation.

The management of the change procedure will ensure the following:

- Proposed changes have a solid technical, safety, environmental, and commercial justification;
- Competent personnel review changes, and their impacts are documented, including in operating

procedures and drawings;

- Hazards resulting from changes altering documented conditions are identified and assessed, ensuring no adverse effects on health, safety, or the environment;
- Changes are communicated to personnel, who are provided with necessary skills through training to effectively implement them.

The appropriate Domus Fabrilis LLC person accepts the responsibility for the change.

5.5.7.2 Stop Work

The general procedure and description around those activities and incidents which would constitute the necessity to stop work are outlined in a project wide procedure. This procedure is used during the construction phase conducted by the project in all of its locations. It covers the stoppage of work due to the immediate/imminent risks to health, safety, and environmental and issues.

5.6 Checking, Corrective Actions and Monitoring

The verification process encompasses inspections, monitoring, and internal audits to ensure the proper implementation of verification systems and the effectiveness of mitigation measures.

Corrective actions involve responding to situations that are out of control, non-compliances, and non-conformances. These actions also encompass efforts aimed at enhancing performance.

Monitoring will be carried out to ensure compliance with regulatory requirements and to assess the effectiveness of operational controls and other measures aimed at mitigating potential impacts.

5.6.1 Auditing

Beyond the routine inspection and monitoring activities conducted, self-audits will be carried out internally by Domus Fabrilis LLC to verify compliance with regulatory requirements as well as their own Environmental standards and policies.

Audits to be conducted will also cover the contractor's self-reported monitoring and inspection activities. The audit shall be performed by qualified staff and the results shall be reported to be addressed.

The audit will include a review of compliance with the requirements of the Environmental documentation and ESMS – Environmental and Social Management System and include, at a minimum, the following:

- Completeness of Environmental documentation, including planning documents and inspection records;
- Conformance with monitoring requirements;
- Efficacy of activities to address any non-conformance with monitoring requirements;
- Training activities and record keeping.

There will be a cycle of audits in specific areas of the Project. The frequency of audits will be risk-based and will vary with the stage of the Project and will depend on the results of previous audits.

5.6.2 Corrective Action

Investigating an incident after its occurrence can yield valuable lessons and insights to prevent similar or more severe incidents in the future.

The construction company will establish a formal procedure for tracking non-compliance and corrective actions, aimed at investigating the causes of accidents or environmental non-compliances and identifying appropriate corrective measures in accordance with the ESG annex of the agreement between the developer and the contractor.

The HSE Manager will be accountable for maintaining records of corrective actions and supervising the adaptation of environmental protection procedures and/or training programs to prevent the recurrence of non-conformances and non-compliances.

5.6.3 Assurance

A large component of the construction phase environmental and social management system is related to assurance that contractor is implementing commitments related to their respective activities.

The contractor has responsibility to check the following:

- Ensuring compliance with company policies, expectations, and best practices throughout project execution.
- Ensuring the project meets all specified requirements consistently across all phases.
- Adhering to ESIA requirements, contractual obligations, legislation, emission standards,

environmental design criteria, method statements, and requirements from lending institutions and fund's environmental and social objectives.

- Ensuring the effectiveness of mitigation measures implemented to manage environmental impacts.
- Ensuring compliance with all project-specific management plans and procedures.

5.7 Monitoring and Measurement

5.7.1 Monitoring Program

The ESIA package specifies a number of requirements for monitoring of environmental and social impacts and mitigations. The Monitoring Program will provide an ongoing assessment of the status of environmental receptors with identified significant impacts, together with the applicable standard. The aim in developing and implementing the Monitoring Program is to ensure compliance with the Bakhvi HPP project commitments with regard to mitigation measures, approved plans and permit conditions and requirements.

The Monitoring Program contains, inter alia:

- Parameters to be measured
- Methods for monitoring
- Sampling locations
- Detection limits, indicating relevant legislation and standards
- Allocation of responsibilities
- Frequency and timing
- Progress and reporting of results

5.7.2 Non-Conformance and Corrective and Preventive Action

Contractor will promptly identify and document any non-conformances with environmental standards and project-specific requirements. The company will analyze the root causes, assess the impacts, and communicate their findings to stakeholders. Contractor will develop and implement timely Corrective and Preventive Actions (CAPA) to address non-conformances, focusing on immediate correction and prevention of recurrence. They will actively monitor the effectiveness of CAPA measures, maintain detailed documentation of all actions taken, and provide regular reports to project management. By integrating lessons learned, contractor will continually improve environmental performance and ensure compliance with regulatory standards, demonstrating their commitment to environmental stewardship and responsible project management.

Relevant Procedure: Non-conformity and Corrective Action.

Relevant Record: Non-conformity records, and Verification and Results of any corrective action.

5.7.3 Records

The contractor is responsible for maintaining comprehensive Environmental and Social (E&S) records that are clear, identifiable, and traceable to specific activities. These records are systematically stored and managed to ensure easy retrieval and protection against damage or deterioration throughout the project lifecycle.

Minimum retention periods for records are aligned with project duration, with provisions for longer retention as required by regulatory or project-specific needs. Essential documentation housed at the contractor's office includes the Bakhvi 2a and Bakhvi 1 HPP project's Environmental and Social Impact Assessment

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(ESIA), non-conformance reports submitted in hard copy, field inspection records, training records, and audit/monitoring reports.

Furthermore, the contractor will maintain an on-site Environmental and Social Management System (ESMS), along with induction training materials, toolbox instruction materials, and instruction reports. This ensures that all aspects of environmental and social compliance, health, safety, and operational protocols are documented and readily accessible for reference and review. By adhering to these practices, the Developer and contractor uphold transparency, accountability, and regulatory compliance throughout the project.

5.7.4 Environmental Management System Audit/Monitoring

Contractors establishes and maintains a self-audit program to assess compliance with environmental, health, safety, and social performance requirements stipulated in the contract and relevant regulations. These audits shall be conducted at regular intervals throughout the project duration.

Regular audits shall be conducted to evaluate contractor activities and ensure compliance with environmental regulations, including adherence to project-specific environmental management plans and mitigation measures.

Audits shall be performed to assess contractor compliance with health and safety protocols, encompassing the use of personal protective equipment (PPE), safe work practices, and emergency response preparedness.

Audits shall verify the quality of contractor workmanship and materials, ensuring alignment with project specifications and standards.

Audits shall assess contractor practices related to community engagement, local hiring, and adherence to social responsibility commitments outlined in the project's social management plan.

Contractors shall conduct audits of subcontractors to verify compliance with all applicable environmental, health, safety, and social requirements as per the contract and project standards.

Field inspections and audits shall be conducted bi-weekly by contractor field personnel to monitor compliance with critical commitments, evaluate the effectiveness of corrective actions, and address any non-compliances or issues identified in previous audits or monitoring activities.

Quarterly audits shall be performed to comprehensively review contractor activities and ensure continuous improvement in environmental and social performance.

Results from field inspections and audits shall be documented and reported to Developer management for compliance tracking, improvement actions, and transparency purposes.

5.8 Management and Review

The ESMS performance is reviewed on an annual basis by both the contractor and developer management against the objectives and targets of the ESMS and as-and-when required, for example in the event of significant changes or developments that affect the ESMS.

The ESMS performance is also reviewed by Fund ESG Manager.

As with the ESMS itself, the key objectives of the management review are to ensure that the ESMS continues to result in continual improvement in environmental and social performance, compliance with ESIA commitments and the prevention of pollution at the RoW and facilities. The review can result in changes to elements of the ESMS. The provision of financial, technological, and human resources to facilitate an effective ESMS are also considered as part of the management review process.

5.9 Environmental and Social Management

The ESMM Matrix, detailed in Annex 1, outlines the Environmental and Social mitigation and enhancement

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measures, as well as the responsibility for monitoring and managing impacts during the construction of the Project.

Additional detailed policies and plans will need to be developed to support the implementation of this document and as part of the development of the Construction Company Project ESMS system.

A full list of the key management plans and strategic Environmental documents identified in the Environmental documentation for this Project is provided in this document:

The timing of the development of the plans will be staged – exploration and implementation-related plans will be finalized prior to the start of construction activities.

The Environmental performance of the construction work undertaken by the contractor will be framed by the Environmental obligations set-out in the Conditions of the Contract agreement between the Client and the Contractor.

The contractor will have to comply with the recommendations and measures identified in the Environmental documentation, which will be set out in the form of various management plans prepared by Domus Fabrilis LLC.

Annex 1 - Environmental and Social Management and Mitigation Measures

ISSUE / ACTIVITY	IMPACT	MITIGATION MEASURES <i>Note: Mitigations apply to specified project phase: Pre-construction (Pre-C); Construction (C);</i>
Pre-construction survey of project site (Pre-C)	Disruption of construction works and damage to environment due to unforeseen circumstances on project sites revealed at construction phase	- Take extreme care in selecting of new project sites (e.g. camps, warehouses) to avoid direct disposal to water body (river near intake) and community;

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Development of required plans (Pre-C)	Damage to social and natural environment due to the absence of required plans	Develop Environmental and Social management system inclusive to the following plans. • ESMS – Environmental and Social Management Plan • Workers Grievance Mechanism • Emergency Preparedness Plan • Health & Safety Management Plan • Traffic Management Plan • Community Health, Safety Management Plan • Open Air Quality Management Plan • Noise & Vibration Control Plan • Erosion, Soil & Vegetation Management Plan • Natural Hazards Management Plan (NHMP) • Effluent and Waste Management Plan • Handling and Storage of Hazardous Substance • Material Management and Spoil Disposal Plan • Site Waste Management Plan • Confined Areas Air Quality Management Plan • Quarry and Borrow Areas Management Plan • Security Forces Management Plan • Site Decommissioning and Rehabilitation Plan • Local Recruitment Plan (the contractor will follow the plan prepared by the developer) • Chance Find Procedure (the contractor will follow the plan prepared by the developer)
Obtaining of all required permits,	Damage to environment due to unauthorized use of natural resources, waste disposal, pollution	- Licenses for inert material extraction (if needed); - Approval of Waste Management Plan by the MoEPA; - Agreement on waste disposal on the nearest landfill;

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ISSUE / ACTIVITY	IMPACT	MITIGATION MEASURES <i>Note: Mitigations apply to specified project phase: Pre-construction (Pre-C); Construction (C);</i>
licenses and approvals (<i>Pre-C</i>)		- Agreement on hazardous waste disposal; - Trees inventory report and permit for tree cut issued by local authority or by the MoEPA in case of Red listed species (if required).
Designation of safeguards staff and providing of required training (<i>Pre-C</i>)	Environmental, Social, Health, and Safety non-compliances	- Designation of Health, Safety, and Environmental, (HSE) Officers; - Providing training as defined by Environmental documentation.
Construction workers and camps (C)	Damage local habitat, compact soil and create erosion via construction camps Contaminate surface water and spread disease via solid waste and feces generated by camps. Introduce alcohol or other socially destructive substances via construction crews Personnel safety risks and risk of disease spread	- Explore off-site accommodation for workers; - Keep camp size to a minimum; - Require that workers preserve as much vegetation as possible, e.g., by creating defined footpaths; - Provide temporary sanitation on site; - Use local or regional labor, if possible; - Screen potential crew members, Provide education and strict guidelines regarding contact with local residents, and guidelines; - Provide adequate quantities of food and cooking fuel; both should be of good quality; - Observing labor safety rules during construction of HPP; - Equipping the personnel with PPE; - Develop an emergency preparedness plan outlining the measures to be taken to prevent emergency situations.

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ISSUE / ACTIVITY	IMPACT	MITIGATION MEASURES <i>Note: Mitigations apply to specified project phase: Pre-construction (Pre-C);</i> <i>Construction (C);</i>
Preparatory works: mobilization of the temporal infrastructure, transport and construction appliances and equipment and mechanisms needed for construction (C)	Emissions of harmful substances into the atmospheric air, propagation and noise propagation; Risks of pollution of surface and ground waters and soils; Negative visual- landscape change;	- Equipping the concrete unit with relevant air-cleaning systems; - Limiting the perimeter of the oil products supply reservoirs to prevent the propagation of the pollutants in case of emergency spills; - Discharge of any kind of untreated wastewater into the rivers will be prohibited; - Making water-proof layers over the surfaces of the storage areas; - Temporal structures, materials, and waste will be placed at locations far away and not visible from the visual receptors; - Fencing the camp territories right at the initial stage of the construction; - Protecting the perimeter of territory and controlling the movement of foreign people in the area; - Equipping the personnel with PPE; - Equipping the camps with first aid kits; - Keeping an incident registration log.

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ISSUE / ACTIVITY	IMPACT	MITIGATION MEASURES <i>Note: Mitigations apply to specified project phase: Pre-construction (Pre-C); Construction (C);</i>
Use of heavy equipment and transportation (C)	Cause erosion due to machinery tracks, damage to roads, etc. Compact soil, changing surface Contaminate ground or surface water when machinery repairs result in spills or dumping of hydraulic oil, motor oil or other harmful mechanical fluids Noise propagation, emissions of dust and combustion products Damage to the local road surfaces Overloaded transport flows, limited movement Risks of safety of local people and personnel	- Minimize the use of heavy machinery; - Set protocols for vehicle maintenance such as requiring that repairs and fueling occur elsewhere or over impervious surfaces such as plastic sheeting; Prevent dumping of hazardous materials; - Excavators will be checked on a daily basis to prevent leaks and oil spillage; - Use of non-faulty construction techniques and vehicles; - Limiting the driving speeds; - Maximally limiting the use of public roads, searching for, and using alternative routes; - Watering the working surfaces in dry weather; - Duly covering the vehicle body during the transportation of dusty materials; - Selecting an optimal bypass to the working area; - Installing road signs and barriers at necessary locations; - Limiting the movement of heavy techniques along the public road as much as possible; - Using flagmen in case of intense traffic; - Making temporal bypasses;
Use of hazardous materials (C)	Contaminate ground or surface water when hazardous construction materials are spilled or dumped Put workers at risk from exposure to hazardous materials	- Prevent dumping of hazardous materials; - Use less toxic alternative products; - Develop and implement a Waste Management Plan; - Ensure that the existing materials to be demolished/dismantled are tested for hazardous contents and action plan for handling, storage, transport, and disposal of the wastes is prepared, informed, and strictly monitored during project implementation.

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ISSUE / ACTIVITY	IMPACT	MITIGATION MEASURES <i>Note: Mitigations apply to specified project phase: Pre-construction (Pre-C); Construction (C);</i>
Biodiversity, Topsoil Management, Cutting down the vegetation cover, (C)	Loss of biodiversity; Loss of topsoil and degradation of sites .	- Particular care must be taken to avoid clearance of avifauna and humid areas or impacts on ecology; - During the breeding period working hours will not overlap with the early morning "down chorus". Working noisy activity will start at least 1 hour after the sunrise; - For cutting down the trees, Obtaining the permit as required, and plants under the supervision of the specialists in an authorized agency; - Estimating the impact of reinstatement and landscaping works; - Cutting the topsoil and piling it in isolation from the lower soil layer and other materials; - In order to avoid topsoil erosion, the height of the fill must be managed according to international best practices.

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ISSUE / ACTIVITY	IMPACT	MITIGATION MEASURES <i>Note: Mitigations apply to specified project phase: Pre-construction (Pre-C); Construction (C);</i>
Noise and Vibration (C)	Noise emissions	- Ensure proper maintenance of the machinery; - Conduct noisy works exclusively during daytime hours; - Limit implementation of noisy works simultaneously; - Identify the period for the construction works causing the noise issues; - The working time and construction schedule must be arranged rationally, and all engineering entities shall make reasonable arrangements for working time; - Prior to implementing noisy works, warn the affected population and provide additional explanation if required; - Locate generators and other noisy equipment away from sensitive receptors; - If necessary, equip personnel with proper protective equipment; - Frequently switch personnel deployed at noisy works to reduce cumulative exposure; - Special training can be provided by the company related to project-specific noise requirements, specifications, and/or equipment operations; - As for the implementation of the works near sensitive receptors including residential, educational, and medical facilities, if the noise, vibration, and dust level exceeds the permissible level, the construction works must be stopped and additional mitigation actions must be executed; - The construction works will not be resumed unless the noise level reaches the norms; - In case of complaints, record them and take appropriate action to address them.

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ISSUE / ACTIVITY	IMPACT	MITIGATION MEASURES <i>Note: Mitigations apply to specified project phase: Pre-construction (Pre-C); Construction (C);</i>
Dust (C)	Dust emissions	- Dust can be controlled through minimizing areas of exposed soil, and using mitigations such as water carts to suppress dust emissions; - Emissions of gases and dust are typical impacts of construction. Trucks and vehicles for nourishment will be limited in number; - In this project, the material for excavation/nourishment will be transported in a covered manner, when necessary, so that the impact on the air environment will be insignificant; - Visual control of dust spread will be controlled strictly mitigated accordingly; - Sheeting of construction materials and storage piles; - Materials transported to the site will be covered/ wetted down to reduce dust; - The construction site will be watered as appropriate; - Protective equipment will be provided to workers as necessary; - Technical check-up of machinery; - Periodically water down excess roads on site; - Wet or cover trucks carrying construction material; - Immediately replacing defective equipment and removing it from the work site.

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ISSUE / ACTIVITY	IMPACT	MITIGATION MEASURES <i>Note: Mitigations apply to specified project phase: Pre-construction (Pre-C); Construction (C);</i>
Surface and ground waters (C).	Risk of water pollution	- Secure and control storage of all toxic and hazardous materials including fuels; - Spill kits are to be kept at fuel storage points and any refueling sites; - Integrity of the water quality is to be protected through appropriate siting and mitigation measures. - Air pollution is to be avoided, with practices such as burning of waste not permitted; - Pollution of groundwater must be avoided; - Water-diversion channels will be made along the perimeter of the topsoil fill and will be protected against the scattering by the wind blow; - In case of storing the topsoil for long, measures must be taken to maintain its qualitative properties. Periodic loosening or grass sowing is meant; - In case of spills of oil/lubricants, the spilled product will be localized/cleaned in the shortest possible time; - The appliances creating the risk of groundwater pollution when in operation will be equipped with drip pans; - The vehicles must be preferably washed at private car washing areas; - Using temporal water diversion channels; - Filling the holes in a timely manner.

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ISSUE / ACTIVITY	IMPACT	MITIGATION MEASURES <i>Note: Mitigations apply to specified project phase: Pre-construction (Pre-C); Construction (C);</i>
Waste (C)	Irregular propagation of waste, environmental pollution	- Execute works in compliance with adopted waste management plan; - Delivering the construction and other necessary materials only in needed quantities; - Regular waste collection and disposal from worksite / contractor's camp (may be temporarily integrated into the existing temporary waste storage area); - Visual control; - Technical check-up of machinery; - Place of disposal of the waste concerned must be enclosed; - Waste must be immediately removed from the working sites; - Waste must be placed in secondary protective basins; - This waste can be transferred only to a certified contractor; - Arranging the temporal waste storage areas and equipping them with relevant signs; - Assigning the duly qualified personnel for waste management; - Instructing the personnel; - Identification of dump sites for inert and construction waste disposal and ensuring proper permissions; - Prevent dumping of hazardous materials; - Use less toxic alternative products; - Develop and implement a Waste Management Plan; - Ensure that the existing materials to be demolished/dismantled are tested for hazardous contents and action plan for handling, storage, transport, and disposal of the wastes is prepared, informed to the contractors, and strictly monitored during the project implementation.

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ISSUE / ACTIVITY	IMPACT	MITIGATION MEASURES <i>Note: Mitigations apply to specified project phase: Pre-construction (Pre-C); Construction (C);</i>
Chance Findings (C)	Accidental damage to the archeological monuments/artefacts	- In case of finding any strange item, stopping the works immediately and informing the technical supervisor and the Client; - Renewing the works only after the formal instruction is received from the technical supervisor and the Client; - All workers will be strictly prohibited from engaging in activities that could damage cultural heritage monuments.

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Annex 2 - Environmental Monitoring Plan

What? (Is the parameter to monitor)?	Where? (Is the parameter to monitor)?	How? (Must the parameter be monitored)?	When? (Frequency or duration of monitoring)	Who (Is responsible for monitoring)?
Dust propagation, exhaust fumes	- Construction camp; - Construction site; - Transportation routes; - The nearest Buildings - Sensitive receptors	quarterly monitoring by the reporting method (production of pad forms), and twice a year instrumental measurements	Instrumental measurement - in case there are complaints from population; Checking dust propagation – during the intense operations and vehicle movement, particularly in dry and windy weather. Checking the technical state - at the start of the working day;	Developer
Noise propagation	The nearest residential houses and public offices	Instrumental measurement (in case of complaints)	This will be done in case of complaints	Developer

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What? (Is the parameter to monitor)?	Where? (Is the parameter to monitor)?	How? (Must the parameter be monitored)?	When? (Frequency or duration of monitoring)	Who (Is responsible for monitoring)?
Traffic	Along the materials and waste transportation routes	Visual observation	Permanently	Contractor/ Consultant
Engineering-geological stability	Sensitive unstable sections	- Visual observation;	Particularly after the periods with precipitations;	Contractor/ Consultant
Soil and ground quality	Areas adjacent to the construction camps;	Visual observation.	Visual observation - at the end of the working day;	Contractor/ Consultant
	- Construction sites; - Materials and waste storage areas.	-No significant oil spills are observed; -Laboratory control (in case of spills).	Laboratory examination - in case of large spills.	Contractor/ Consultant

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What? (Is the parameter to monitor)?	Where? (Is the parameter to monitor)?	How? (Must the parameter be monitored)?	When? (Frequency or duration of monitoring)	Who (Is responsible for monitoring)?
Temporal storage of the removed ground and topsoil	- Construction sites; - Ground storage areas.	- Visual observation: - The lower soil layer and topsoil are piled separately. - The height and inclination are managed according to international best practices - The soil is placed far from the surface water objects. - There are water diversion channels along the perimeter of the storage area; - The soil is stored temporarily at places preliminary agreed with the technical supervisor.	Every day following the completion of ground works.	Contractor/ Consultant
Vegetation cover	- Construction sites	Visual observation: - The works within the limits of the marked zone and no additional harm or plants or illegal cuttings take place.	Visual observation - at the end of the working day;	Contractor/ Consultant

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What? (Is the parameter to monitor)?	Where? (Is the parameter to monitor)?	How? (Must the parameter be monitored)?	When? (Frequency or duration of monitoring)	Who (Is responsible for monitoring)?
Waste management	-Construction camps; -Construction sites;	Visual observation: -The sites of temporal waste disposal are assigned in the construction area and are duly marked.	-Visual observation - at the end of each working day; -Checking of documents on amountsof produced and disposed wastes	Contractor/ Consultant
	-Temporal waste storage areas;	-The storage areas for hazardous waste are protected against the penetration of strangers and against the weather impact; -On the territory, at due locations, there are marked containers to collect domestic waste. -The sanitary condition of the territory is satisfactory – no dissipated waste is observed. -The waste is not stored on the territory for long time.	Document check - once a month	Contractor/ Consultant
	- Construction Contractor's office	- Checking the waste registration log; - Checking the documented agreement		Contractor/ Consultant

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What? (Is the parameter to monitor)?	Where? (Is the parameter to monitor)?	How? (Must the parameter be monitored)?	When? (Frequency or duration of monitoring)	Who (Is responsible for monitoring)?
		about waste disposal;		
Oils and oil products management	-Construction camps; -Warehousing facilities	Visual observation: -The protected areas for oils, oil products, and other liquid products are marked in a due manner;	- Visual observation - at the end of each working day; - Document check on amounts and types of oil products	Contractor/ Consultant
Technical state of the access road, possibility of free movement	-Corridors of the transportation routes	Visual observation: -The vehicles move along the routes specified in advance, bypassing the settled areas as far as possible; -The state of the driving routes is satisfactory; - Free movement is not limited.	- During the intense transport operations	Contractor/ Consultant

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What? (Is the parameter to monitor)?	Where? (Is the parameter to monitor)?	How? (Must the parameter be monitored)?	When? (Frequency or duration of monitoring)	Who (Is responsible for monitoring)?
	-Construction Contractor's office	- Checking the waste registration log, - Checking the documented agreement about waste disposal	Document check - once a month	Contractor/ Consultant
Oils and oil products management	-Construction camps; -Ware housing facilities	Visual observation: -The protected areas for oils, oil products and other liquid products marked in a due manner;	1. Visual observation - at the end of each working day; 2. Document check on amounts and types of oil products.	Contractor/ Consultant
Technical state of the access road, possibility of free movement	1. Corridors of the transportation routes	Visual observation: 1. The vehicles move along the routes specified in advance, bypassing the settled areas as far as possible; 2. The state of the driving routes is satisfactory; 3. Free movement is not limited; 4. Driving speeds are observed.	1. During the intense transport operations	Contractor/ Consultant

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Annex 3 - Incident Reporting Form

Domus Fabrilis LLC		Incident Reporting Form			
Date		Time		Location	
Description		Personnel injury			
		Property damage			
		Transport damage			
Type of Incident					
Incident Description					
Incident Investigation					
Measures taken					
Prevention measures for remediation					
Signature					
Date					

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