

Čibuk 1 Wind Project Environmental and Social Action Plan

Wind Energy Balkan Group, Belgrade (Vetroelektrane Balkana d.o.o., Beograde) are planning to construct and operate the Čibuk 1 Wind Project about 30 kilometers northeast of Belgrade, Serbia, in the municipality of Kovin, Autonomous Province of Vojvodina. The Project includes about 50 kilometers of new or improved access and site roads, 57 turbines, an on-site substation, underground cables to convey electricity from turbines to the substation, and a 10.8-kilometer 400kV transmission line to convey electricity from the substation to the national grid. Project financing is being provided by the International Finance Corporation (IFC), the European Bank for Reconstruction and Development (EBRD), and the Overseas Private Investment Corporation (OPIC) (collectively, the “Lenders”).

WEBG will need to implement a number of actions to ensure and verify that the Project is constructed and operated in compliance with Serbian law, IFC Performance Standards, EBRD Performance Requirements, and Good International Industry Practice (GIIP). This Environmental and Social Action Plan (ESAP) defines those actions. In general, the ESAP requires compliance with the Environmental and Social Management and Mitigation Plan (ESMMP) that is being developed for the Project, and includes specific requirements for many of the actions whose purpose is to avoid, reduce, or otherwise mitigate the most significant potential impacts.

The table below constitutes the ESAP. It identifies the required actions, the basis of the requirement, the timing of the action, the criteria to be used for determining whether the required action has been successfully achieved, and information that will be reported to the Lenders. Implementation of the actions is the responsibility of WEBG. When contractors perform work under contract to WEBG or their designee(s), WEBG will be responsible for those contractors’ compliance with the requirements of the ESAP. This is expected to be accomplished by inclusion of requirements in contracts and subcontracts, and by direct oversight and supervision by WEBG and/or its designee, as needed.

Performance of the actions required by this ESAP will be reported to the Lenders by WEBG as required by the ESAP and the financing agreements. The ESAP will be audited or otherwise evaluated by the Lenders throughout construction and operation of the Project.

As agreed by the Lenders and WEBG, this ESAP may be revised from time to time during Project implementation, sometimes in response to evaluations conducted under the ESAP itself. No changes will be made if they could allow violations of Serbian law or of Lenders’ requirements for environmental and social performance.

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<i>Requirement</i>		<i>Source of requirement</i>	<i>Implementation date</i>	<i>KPI / Reporting¹</i>
0	Prepare and submit environmental and social monitoring reports that show status of compliance with IFC PSs, EBRD PRs, and with the requirements of this ESAP.	IFC PS1 EBRD PR1	Every six months during construction, annually thereafter	KPI: submission of report in mutually agreed format
IFC PS 1, EBRD PR1: Environmental and Social Assessment and Management				
1.1	Design a framework for defining the organisational structure of the WEBG Project Management Team, with all key roles represented in an organogram. Appoint and maintain person(s) to be responsible for environmental, social, and occupational health and safety for the project, to report directly to the project manager, and subsequently to the WEBG management board.	IFC PS1 EBRD PR1 GIIP	– Appoint: Within 90 days of financial close, but prior to construction	- Organogram designed - Responsible person(s) appointed/hired and on staff <i>ESHS reporting:</i> - Status of appointments, including CVs of appointed professionals
1.2	Develop and implement an integrated management system for environmental and social performance and for occupational health and safety. Relevant requirements during construction and operation should be made the responsibility of GE Wind Energy GmbH, the key project contractor. (see items 1.5). [Note: system(s) should generally meet objectives of ISO14001 and OHSAS 18001, but need not be certified]	IFC PS1 EBRD PR1 GIIP	- Develop systems prior to construction - Implementation during construction	- Development and implementation of the ESHS management system throughout the project. <i>ESHS reporting:</i> - Report to Lenders on status of system development and implementation
1.3	Develop an Environmental Social Management and Mitigation Plan (ESMMP) for the project comprising full details of environmental, social, health and safety (ESHS) performance requirements and obligations for construction, operation and decommissioning of the project. To include detailed timelines for implementation of specific mitigation measures and monitoring activities. ESMMP to require detailed	IFC PS1 EBRD PR1 GIIP	- Develop ESMMP: prior to financial close - Implement: throughout construction and operation - CEMP: develop before construction, implement throughout construction	- ESMMP developed and in place – Construction and operation in compliance with ESMMP <i>ESHS reporting:</i> - Report status of plan development - Report material deviations from plans

¹ “KPI”: Key performance indicator. “Reporting” = information to be reported to the Lenders in annual environmental and social monitoring reports under item 0.

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	construction environmental management plan (CEMP) and associated subplans, including those recommended within the ESAP.			
1.4	WEBG ESHS professionals (see 1.1) to review and approve ESMMP and contractor CEMP subplans, including review and approval by third-party consultancy acceptable to Lenders.	IFC PS1 EBRD PR1	- Prior to construction	- ESMMP and CEMP subplans reviewed and approved by CWP and competent third-party acceptable to Lenders - Plans provided to Lenders for review and no-objection approval <i>ESHS reporting:</i> - <i>Status of ESMMP and subplan review and approval</i>
1.5	Develop and implement Contractor/Subcontractor Management Plan to manage ESHS planning and performance of construction and other contractors, including at a minimum: - Inclusion of relevant ESAP requirements in contracts/subcontracts. - Clear assignment of WEBG and contractor ESHS responsibilities. - Contractor reports sufficient to allow WEBG to include relevant data in reports to Lenders, and to allow evaluation of need for corrective actions. - Verification of training and/or proper credentials for contractor staff/managers responsible for ESHS	IFC PS1 EBRD PR1 GIIP	- Develop/adopt: prior to executing contracts/ subcontracts - Implement: throughout execution of contracts/subcontracts	Development, adoption, and implementation of contractor management system <i>ESHS reporting:</i> - <i>Report to Lenders on development of policy/procedures</i> - <i>Report ESHS training(s) of contractors/subcontractors</i> - <i>Report status and highlights of contractor oversight</i>
1.6	Undertake activities that require permits and/or consents/authorizations by relevant authorities only after such permits and/or authorizations are in place. Comply with all required conditions.	Serbian law IFC PS1 EBRD PR1	Prior to undertaking any activity that requires permit or authorization	- Permits/authorizations received <i>ESHS reporting</i> - <i>Report on status of permits/ authorizations</i> - <i>Report immediately any citations or fines for noncompliance, and other instances of material noncompliance</i>

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IFC PS 2, EBRD PR 2: Labor and working conditions			
2.1. WEBG and their contractors to develop/maintain written human resources policies and procedures in accordance with PR2 and PS2 requirements and ensure the relevant policies are available to all employees in their language(s). The HR policy/procedure should contain an enforceable code of conduct applicable to all workers, including in particular those who are not of local origin, or a stand-alone code will need to be developed (see also 4.2 below).	IFC PS2 EBRD PR2 GIIP	Within 3 months of commitment of funds or prior to construction (whichever is first).	<ul style="list-style-type: none"> - HR policy and procedures are developed in accordance with PR2 and PS2, in place and available to direct workers and contractor employees - Contractors' policies and procedures inspected and approved by Lenders or third party acceptable to Lenders <i>ESHS reporting:</i> <ul style="list-style-type: none"> - Report status of HR policies and procedures - Provide summary of makeup of workforce by skill level, age, gender, geographic origin, and other key variables
2.2. Develop and implement occupational health and safety plan(s) to guide all activities on project site during site preparation, construction, and operation and ensure that all contractors adopt these plans. Requirements to include, at a minimum: <ul style="list-style-type: none"> - Job- and task-specific hazard analysis and controls for all activities - Provision of personal protection equipment (PPE), requirements for use of PPE, and enforcement of PPE use - Safety training for all personnel in their language, covering hazards and safety protocols of their jobs - Special training for specific hazards: working at heights, in excavations, with electricity - Review and approval of contractors' OHS plans - Oversight of contractor OHS implementation, including mandatory reporting - Recording incident statistics, including total work 	Serbian law IFC PS2 EBRD PR2 GIIP	Plans in place prior to undertaking on-site activities that would be subject to requirement	<ul style="list-style-type: none"> - OHS plans developed, reviewed/approved, and in place - Safe workplace, minimal incidents and lost time <i>ESHS reporting:</i> <ul style="list-style-type: none"> - Provide evidence of review and approval of OHS plan(s) for all project contractors and subcontractors by qualified professional - Report on OHS issues, including work hours, incident statistics, and status of training (to cover entire site workforce) - Report immediately (within 48 h) in case of major accidents and/or fatalities

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	hours, lost time incidents, major injuries, fatalities, etc.			
2.3	Develop and implement a grievance procedure for all workers, including contractor employees. Include in formal HR policy, ensure all workers know it is available (item 2.1). <i>Note: this mechanism is separate from the one for external stakeholders that is part of the Stakeholder Plan under PR/PS 10.</i>	IFC PS2 EBRD PR2	Same as item 2.1 above - Dissemination of information to workers: at time of hiring or first work	- Adoption and implementation of employee grievance procedure <i>ESHS reporting:</i> - Report to Lenders summary of grievances and resolutions
				-
IFC PS 3, EBRD PR 3: Resource Efficiency and Pollution Prevention				
3.1	Maintain equipment and take other measures to keep noise to a minimum, including avoiding/minimizing use of equipment at night. Monitor for noise at receptor locations upon request by affected people. Implement appropriate mitigation if noise exceeds applicable standards.	IFC PS3 EBRD PR3 GIIP WBG EHS guidelines	- Construction noise controls: throughout construction - On-demand monitoring: upon receipt of complaint or request during construction and operation	- Minimal noise disturbance <i>ESHS reporting:</i> - Report summary of noise complaints and actions taken
3.2	Develop and implement construction phase dust suppression plan to ensure dusty loads are sheeted and unsealed roads are damped-down.	Serbian law IFC PS3 EBRD PR3	- Develop: prior to construction - Implement: throughout construction when suppression is needed	Minimal occurrence of dust nuisance
3.3	Develop and implement emissions control plan for the concrete batch plant (air and water)	IFC PS3 EBRD PR3 EU IED WBG EHS guidelines	- Develop: prior to operation - Implement: throughout operation of plant	- Emissions managed and in compliance <i>ESHS reporting:</i> - Report compliance status
3.4	Develop and implement waste and hazardous materials management plans for construction and operation phases, to cover all liquid and solid wastes	Serbian law IFC PS3 EBRD PR3	- Plan(s): prior to generation of wastes and management of hazardous	- Identification of wastes and hazardous materials, development of plan(s)

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	and materials (chemicals, fuel, construction debris, excess spoil, domestic/household wastes, spill cleanup debris, etc.). Maximize waste reduction, reuse, recycling, etc.)		materials - Implementation: throughout construction and operation	- All wastes and materials managed according to plan <i>ESHS reporting:</i> - Report on status of plan development and approval by authorities (if required) - Report immediately any major releases or incidents
3.5	Earthen material management: - Segregate and store in stable piles all topsoil and subsoil salvaged from construction areas. - Store rock in stable piles. - Protect all storage piles with covers, including vegetative cover (native grass species) as needed to prevent wind/water erosion and desiccation. - Use best practices to prevent or retard run-off. - Reinstate all disturbed areas by covering with topsoil and seeding/planting with native species, or returning to tillage.	Serbian law IFC PS3 EBRD PR3 GIIP	- Plan: Prior to ground-disturbing activities - Erosion control per plan: throughout construction	- Adoption of plan, implementation of best practices, protection of topsoil and stored rock - Minimal erosion and loss of topsoil <i>ESHS reporting:</i> - Report to Lenders on plan status and highlights of erosion control program.
3.6	Develop water management plan for construction phase, to include: - Detailed assessment of water needs and potential sources, including measures to reduce water usage including use of wastewater for damping roads, reuse in batch plant, etc. - Hydrogeologic evaluations of sustainability of water extraction from aquifers used by Dolovo and/or other candidate water systems/sources - Monitoring of Dolovo village aquifer response to pumping (or other aquifer that may be exploited) - Contingency actions and sources in case Dolovo or other system cannot or does not provide all water needs, either continuously or periodically	IFC PS3 EBRD PR3	- Plan developed; prior to initial use of water from Dolovo or other systems - Plan implementation and monitoring: throughout period of water use	- Sufficient and sustainable water supply - No adverse effects on Dolovo or other water systems/aquifers <i>ESHS reporting:</i> - Status of water management plan - Limitations on source sustainability, if any, and highlights of contingency plans - Actions taken in case changes in water supplies or usage are needed

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	- Curtailment of water imports from Dolovo or other system as necessary to ensure other users suffer no shortages or loss of water			
IFC PS 4, EBRD PR 4: Community Health, Safety and Security				
4.1	Develop and implement plans and procedures to protect public health, safety and security. Plans and procedures to include, at a minimum: - Traffic management plan (see 4.2) - Public notices of hazards associated with works and equipment during construction and operation (see 10.1 and 10.2) - Emergency preparedness and response plan - Security measures to prevent unauthorised access during construction and minimize access to substation and turbine interiors during operation	Serbian law IFC PS4 EBRD PR4	- Develop plans and procedures before construction. - Plans and procedures to be kept up to date and relevant throughout the project lifecycle.	- Plans and procedures developed, made available, and implemented - No firearms by security personnel <i>ESHS reporting:</i> - Report on status of plans and procedures adoption - Report summary of incidents involving members of the public including trespassers - Report to Lenders immediately if determined that armed guards are necessary – report before providing arms
4.2	Develop and implement traffic and transport management plan(s) to include access, routing, diversions, exceptional loads, and driver training. Consult with local stakeholders and provide timely information to users of land of times access to their land may be necessary, or limited. Contracts must ensure compliance with plan(s). Plans must cover transport of turbines, rock/stone, and other materials to be brought to or removed from the site.	Serbian law IFC PS4 EBRD PR4	- Develop: prior to transport - Implement: throughout materials transport	- Plan developed in consultation with local authorities - Traffic managed in compliance with plan <i>ESHS Reporting</i> - Report on plan status - Report summary of training and of traffic incidents
4.3	During construction and operation, monitor noise at residences upon request and take actions to reduce or control noise as needed to meet applicable standards. Ensure proper noise controls on vehicles and equipment. When designing the substation, use technology whose specifications ensure that noise standards will not be exceeded. T	Serbian law IFC PS3,4 EBRD PR3,4	Monitoring and controls: monitor as requested, control/reduce as needed	- Appropriate construction design to minimise noise - On-demand monitoring and mitigation as needed <i>ESHS reporting:</i> - Report noise complaints, monitoring results, and mitigation measures

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				<i>applied</i>
4.4	Investigate reports/complaints of shadow flicker and, if needed, develop mitigation to prevent shadow flicker	IFC PS4 EBRD PR4	<ul style="list-style-type: none"> - Investigate: upon receipt of complaint - Mitigation (turbine shutdown at certain hours of certain days in certain weather conditions): if needed - Compensation: if needed and agreed by affected people 	<ul style="list-style-type: none"> - No shadow flicker disturbance, or appropriate mitigation/ compensation in place <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Report shadow flicker complaints and actions taken
4.5	Set goals for and encourage contractors to hire local workers, with preference for those who may be directly affected by noise, traffic, or other project activities. Commission and implementing a training program to upgrade skills of unskilled local workers as part of the social investment program. Consider providing funding for local students' university education in science and/or engineering disciplines (e.g., ornithology)	IFC PS2,4 EBRD PR2,4 GIIP	<ul style="list-style-type: none"> - Establish goals: prior to engaging contractors - Commission training program: by financial close 	<ul style="list-style-type: none"> - Significant local hiring, including semi-skilled and skilled workers - Training for local workers - Educational support provided <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Report numbers of local vs non-local vs expatriate workers, and skill levels - Report results of social investment program, including for training, education, and other investments that can benefit the project as well as social welfare
IFC PS 5, EBRD PR 5: Land acquisition and involuntary resettlement				
5.1	Complete the delivery of the Land Acquisition Plan in case involuntary resettlement becomes necessary. Continue to provide replacement or compensation at replacement value to any person who suffers economic losses caused by loss of use of land (whether use was authorized or not), damage to crops, injury or death to animals, loss of access to fields, etc.	Serbian law IFC PS5 EBRD PR5	Replace/compensate as soon as possible after damages or losses	<ul style="list-style-type: none"> - No economic losses by any affected person <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Report summary of damages/losses and status of replacement/ compensation

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IFC PS 6, EBRD PR 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources			
<p>6.1 Appoint qualified professional(s) with expertise in ornithology and chiropterology to revise methodology for bird and bat monitoring to include the proposed transmission line corridor and to survey bat roosts in accordance with Eurobats guidance. Implement the modified monitoring program for three years under the oversight of independent expert(s).</p>	<p>Serbian law IFC PS6 EBRD PR6</p>	<ul style="list-style-type: none"> - Appointment of experts: prior to financial close - Modified and approved methodologies: within 30 day of close - Monitoring program implemented: over any 12-month period prior to commissioning - Monitoring results: initial report prior to commissioning, subsequent reports annually. 	<ul style="list-style-type: none"> - Experts appointed - Methodologies modified - Data collected, compiled, reported <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Report status of appointment - Provide revised methodology - Provide summary of survey results
<p>6.2 Appoint independent expert(s) to conduct annual evaluation of bird and bat seasonal monitoring (item 6.1) and results in order to:</p> <ul style="list-style-type: none"> - Assess adequacy of previous characterization(s) of bird/bat use, residence, and passage - Re-evaluate impacts on birds and bats - Recommend changes to operating parameters (such as rotation speed or operating hours during sensitive periods/hours) and/or other mitigation - Consider cumulative impact on birds and bats and recommend additional mitigation, if required. 	<p>IFC PS6 EBRD PR6</p>	<ul style="list-style-type: none"> - Appoint: prior to year 1 of operation - Recommendations for mitigation, possibly including radar: annually for three years 	<ul style="list-style-type: none"> - Expert(s) appointed - Assessments and recommendations made and adopted <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Report status of appointment, including CV(s) of expert(s) - Provide summary of assessments including cumulative, evaluations, and recommendations - Report on modifications to mitigation and/or monitoring programs
<p>6.3 Design and implement methodology to measure bird and bat mortality due to collision with turbines and blades, and with transmission line. If excessive mortality is experienced, based on opinion of qualified experts, recommend and adopt additional mitigation measures. Continue monitoring until experts determine risk is adequately understood and acceptable, but for at least three years.</p>	<p>Serbian law IFC PS6 EBRD PR6</p>	<ul style="list-style-type: none"> - Methodology designed: prior to commissioning - Implemented: at least three years during operation, until experts recommend cessation 	<ul style="list-style-type: none"> - Methodology designed, approved by authorities and/or independent expert, - Additional mitigation implemented, if needed <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Provide summary of survey designs

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				<i>and results</i> - Describe any additional mitigation
6.4	Appoint a qualified ecologist/botanist to conduct surveys of areas to be cleared of vegetation (turbine and OHL pylon locations, new roads, laydown areas, etc.) to identify protected or otherwise valuable plants and/or animals that could be destroyed or adversely affected. If protected or valuable species are identified, consult with authorities to identify mitigation, which could include relocation or seed collection of floral species, adjusting schedule to avoid nesting/breeding by protected fauna, avoidance of specific locations, etc.	Serbian law IFC PS6 EBRD PR6	- Competent professional appointed and surveys conducted: immediately prior to construction at specific sites - Mitigation/conservation implemented: as required by authorities to avoid impacts on protected species	- Competent professional appointed - Surveys completed - No adverse effects on protected species <i>ESHS reporting:</i> - Report on status of appointment and surveys, and of any required mitigations
6.5	Prepare and implement a landscape management plan for all project activities. Plan is to call for (at a minimum): - Vegetation screening of substation and buildings - Restoration/revegetation of all disturbed ground as soon as construction activities are completed - Use of native species for seeding/replanting. - Monitoring and repairs until vegetation is self-sustaining for at least three successive years	IFC PS4,6 EBRD PR4,6	- Plan: Prior to construction - Implementation: throughout construction and operation	- Development and implementation of the plan. - Agreement of planting areas - Clearing of vegetation only where required <i>ESHS reporting:</i> - Report highlights of plan and of implementation
6.6	Design transmission line towers to be “bird-friendly”, with sufficient spacing, and insulation to minimize risk of electrocution of the largest bird species known to occur in Deliblato Sands area.	IFC PS6 EBRD PR6 GIIP	- At time of design	- Bird-friendly towers - Minimal risk of electrocution of large birds <i>ESHS reporting:</i> - Report status of tower design
6.7	If recommended by competent experts under 6.2 or 6.3 above, install bird diverters on all or part of transmission line conductors.	IFC PS6 EBRD PR6 GIIP	- Install: as recommended by competent experts	- Bird diverters installed as recommended - Minimal risk of collision mortality <i>ESHS reporting</i> - Report status of bird diverters

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6.8	The company will establish and maintain a collaborative relationship with developers of other windfarms in the vicinity of Čibuk 1 to understand the potential cumulative impact of these windfarms. The objective will be to share information on bird and bat movement, collision risk, mortality, as well as management actions to mitigate possible cumulative impacts. The conclusions of any collaborative CIA activity will be used to inform and if relevant, revise the project ESMMP.	IFC PS6 and PS1, EBRD PR6 GIIP, WBG EHSs	–Information shared: as needed –Adaptive management: throughout construction and at least three years of operation	- Adaptive management approach implemented based on engagement with other project developers - Revision of ESMMP as needed to address cumulative impacts; Information shared as requested <i>ESHS Reporting:</i> - Report status of other wind projects in area - Report on recommended changes to ESMMP
IFC PS 8, EBRD PR 8: Cultural Heritage				
8.1	Appoint one or more competent professional(s) to oversee all excavations and other ground-disturbing activities at the 22 turbines and 4 transmission line tower locations identified by the Institute for Protection of Cultural Monuments. Provide the professional(s) with authority to stop work in case of possible discoveries and ensure that site foremen are aware of that authority.	Serbian law IFC PS8 EBRD PR8	- Appointment: prior to ground disturbance at designated locations - Oversight: at all times during excavations/ ground-disturbing activities at locations - Work stopped, conservation undertaken: upon discovery	- Competent professional(s) appointed - All excavations and other activities overseen by competent professional - No removal or loss of cultural heritage without appropriate conservation <i>ESHS reporting:</i> - Report status of appointment - Report discoveries
8.2	Develop and implement chance find procedure, train all foremen in its use, including empowerment to stop work. Train/advise workers and foremen of the types of cultural heritage that may be discovered.	Serbian law IFC PS8 EBRD PR8	- Develop: prior to construction - Implement: throughout construction	- Procedure in place and available for review, training provided to all foremen - No cultural heritage removed or lost without appropriate conservation <i>ESHS reporting:</i> - Report chance finds and actions taken
IFC PS 1, EBRD PR 10: Stakeholder Engagement				
10.1	Implement the Stakeholder Plan (SEP), including the	IFC PS1	- Implement second round:	- Stakeholders informed and engaged

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	<p>grievance mechanism for external stakeholders, and a second round of public consultations, which will include:</p> <ul style="list-style-type: none"> - Make monitoring data available via website or otherwise on request. - Open-house events in villages Devojacki, Bunar, Novo Selo, Vladimirovac, Dolovo, and Mramorak villags, and Kovin municipality. Invite all stakeholders, prepare visual displays of key project information, stakeholder will be invited, and make knowledgeable company officials available to answer stakeholder questions. - Make available copies of ESIA documentation (updated ESIA, LAP, SEP, ESAP) at all open houses and maintain documents in all town halls. - Notify Serbian NGOs with interest and expertise in birds and bats of the availability of the updated ESIA documentation, request meeting to provide and receive information. 	EBRD PR10	<p>during IFI disclosure periods</p> <ul style="list-style-type: none"> - Implement continuing engagement per SEP: - throughout construction and operation 	<p>as defined in SEP</p> <ul style="list-style-type: none"> - Grievance mechanism for external stakeholders in place and operational <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Report to Lenders highlights of stakeholder engagement - Report to Lenders summary of grievances and responses
10.2	<p>In accordance with SEP, provide early notice to villages and residents prior to major increases in traffic or other project activities that could affect them.</p>	<p>IFC PS1 EBRD PR10</p>	<p>Notice provided: before impacts occur</p>	<ul style="list-style-type: none"> - Affected people given advance notice of changes in impacts <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Report to Lenders highlights of notices