

Syvash Wind Farm – Environmental and Social Action Plan (ESAP)

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
General Environmental, Social Governance (ESG) management							
1.	Ensure Compliance with National legislation and attain all relevant National Permits, including EIA permit for the Project and associated infrastructure such as power lines, roads etc. prior to construction.	Compliance with local legislation.	Lenders	NBT with support from external consultants	Confirmation prior to first disbursement	<p>Prior to first disbursement provide information on status of compliance and confirmation of all permits in place.</p> <p>Summarize in annual report Ongoing follow-up per ESAP.</p>	<p>Open</p> <p>Application to be submitted w/c 14 May 2018. Process finalized August 2018. Clarity on the EIA process expected by end of June</p>
2.	Provide an annual summary of implementation of Project and, Environmental and Social Action Plan (ESAP) and Environmental and Social Management Plan (ESMP). Ongoing information of any complaints or non-compliance events.	<p>Compliance with local legislation.</p> <p>Need to ensure resources are provided for implementation.</p>	Lenders	NBT	First report in 2019 then annual	<p>Prior to first disbursement provide information on status of compliance and confirmation of all permits in place.</p> <p>Summarize in annual report Ongoing follow-up per ESAP.</p>	Open

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3.	<p>Increase internal E&S capacity with E&S staff with adequate qualifications, skills and experience.</p> <p>Appoint an Environmental, Health and Safety (EHS) manager as well as a community liaison officer to management EHS and Corporate Social Responsibility (CSR) issues for the Project.</p>	<p>Increased monitoring of the Project sites and contractors.</p> <p>Ensure appropriate staff available to manage issues.</p>	Lenders	NBT	Prior to construction	<p>Updated HSSE Organisation chart and manage construction process.</p> <p>Liaison officer to visit on regular basis local regulators and communities to ensure implementation of SEP and CSR.</p>	Open
4.	<p>Develop and implement an EHS management system for the Project in line with corporate EHS management system and including the management of internal and external grievances.</p> <p>Review EPC contractor Environmental and Social Management System (ESMS) capabilities.</p>	<p>Implement Environmental and Social Management System specific Environmental and Social Management Plans for the management of environmental and social risks Project.</p>	PR 1/PS1	NBT, with support from external consultants	<p>During mobilization before construction</p> <p>The documents for the operation phase will be produced before commissioning</p>	<p>Documentation for construction and operation phases are prepared before construction and commissioning respectively.</p> <p>Ongoing follow-up per ESAP.</p>	Open

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5.	<p>As part of Corporate Social Responsibility (CSR) program develop a CSR and community interaction action for the project. An initial budget of 20K USD for 2018, and then around 20K USD per annum with a flexibility to distribute according to the needs of the local communities around the Project.</p> <p>The CSR will include the development of local action plan and interaction with the local community and support for local development projects. A summary of the CSR program will be made available locally in local press and web site.</p> <p>The CSR will be developed in close co-operation with other developers in the areas (such as Vindkraft) to ensure consistency of approach.</p>	<p>The CSR program will aim to assist the local community to ensure there is a 'buy-in' into the Project and there are some local benefits from the Project.</p>	<p>Lenders requirement, best practice.</p>	<p>A minimum lump-sum contribution of USD 20 k, and then an annual contribution of circa USD 20 K to be distributed on as needed basis, with a principal that every community receiving funding every 2 years.</p>	<p>Report to Lender and information published in local paper and on web site on the CSR program, what funds are used for and how they benefit the local community</p>	<p>2018 – onwards.</p> <p>Commitment provided prior to financial close with CSR program in place</p> <p>In annual report provide information on CSR and sum spend per community and total and priority programs Ongoing follow-up per ESAP.</p>	<p>The CSR program will be stand alone for the Project. The CSR program will link with the SEP to ensure a consistent approach and engagement with local community.</p>

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6.	<p>Publish Environmental and Social Impact Assessment (ESIA) inclusive of Non Technical Summary (NTS) on NBT web site and maintain information on internet and in local community.</p> <p>Every 3 years undertake a review (internal audit) of implementation and need to update NTS, ESAP (including ESMP) and Stakeholder Engagement Plan (SEP).</p>	<p>Update information as needed.</p>	<p>EBRD / Lenders existing ESAP</p>	<p>NBT</p>	<p>Ongoing</p>	<p>NTS published.</p> <p>Ongoing follow-up per ESAP.</p>	<p>Open</p>
7.	<p>The existing relevant biodiversity reports to be updated in line with EBRD PR1/IFC PS1 and PR6/IFC PS6, including management strategy and mitigation measures for all phases in line with findings of additional baseline studies.</p>	<p>Need to further review sites data, notably on biodiversity to help define the ESH management plans and mitigation actions.</p> <p>A well-defined area of influence and baseline data is essential to capture all potential impacts and changes related to the Project activities and to define the appropriate mitigation measures.</p>	<p>PR 1 (PR6) PS1 (PS6)</p>	<p>NBT, with support from external consultants after the baseline data collection.</p>	<p>The following Biodiversity Baseline Studies are completed by September 2018: Birds, Flora, Bats, Fauna.</p>	<p>Completed Biodiversity Baseline studies by September 2018.</p> <p>Ongoing follow-up per ESAP.</p>	<p>Open</p>

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8.	Provide a supplementary ESIA document providing a cumulative impact assessment, including birds, noise, social and other impacts as appropriate.	Need to co-ordinate approach with other developers to ensure cumulative issue are well assessed and joint mitigation or management plans implemented.	EBRD PR1	NBT resources	Within 30 days of initial disclosure	Supplementary ESIA provided to Lenders for review.	Open
9.	Develop a Cumulative Assessment of Wind Projects in the areas with other developers. This will take account of biodiversity impacts and community impacts and include information on best management of wind farms and optimization of mitigation measures. A join presentation to be made in 2019 and 2020 of the findings. The ESAP to be updated based on the findings of the reports.	Need to co-ordinate approach with other developers to ensure cumulative issue are well assessed and joint mitigation or management plans implemented.	Lenders EU and Ukrainian law on SEA	External and internal	2018-19, reports in 2020 and 21	Part of SEP Report on intranet and local presentations. Copy of reports in 2020 to Lenders.	Open
PR1 Assessment and management of Environmental and Social Impacts and Issues							
10.	Disclose the ESIA discourse packages and fully implement the ESMP from the ESIA. Update the ESMP as needed, with material issues referred to Lenders for non-objection bases prior to implementation.	Need to fully implement the Project Non-compliance with PRs.	EBRD PR1/PS1 Lenders requirements	NBT resources	Prior to financial close	ESIA provided to Lenders Inclusive of supplementary ESIA document providing cumulative impact assessment.	Open

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11.	Undertake additional review of final Project design and layout to include results of updated bird, noise and flicker assessments (and others as appropriate) to reflect any change in the wind turbine location and operational mitigation.	Need to ensure appropriate assessment of all risks based on final design.	Lenders Requirement	Own and external	2018-19	Prior to construction.	Open
12.	Undertake a detailed assessment of economic displacement impacts to supplement existing ESIA & determine whether a Livelihoods Restoration Plan will be required.	Non-compliance with PRs.	EBRD PR1	NBT resources	Within the 60 day disclosure period	Updated ESIA disclosure package and provide copy of report to Lenders.	Open
13.	Update the Project ESMP as disclosed in ESIA to include clear list of all sub plans referred to in ESIA as well as outline of issues to be addressed within each sub plan. Identification of responsibilities for development of sub plans and implementation responsibilities. Identification of construction vs operational sub plan. Clear templates for regular monitoring and reporting of EHS performance and Key Performance Indicators (KPIs) is required.	Optimisation of environmental and social management through formalised system. Labour unrest. Community unrest. Company reputational damage.	EBRD PR1	NBT resources External consultants Responsibility: NBT environmental manager	Framework document prior to financial close. Final document prior to start of construction	ESMP provided to Lenders and EBRD for review.	Open

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14.	<p>Prepare construction ESMP Sub Plans, covering but not limited to the following themes: Camp Management Plan and Worker Code of Conduct Local Hiring Livelihoods Restoration (if necessary) Security Community health and safety Hazardous Materials Safety & Management Traffic and Road Safety Exposure to Disease Emergency Preparedness and Response Biodiversity Archaeological/Cultural Heritage Chance Finds Dust Waste water Noise pollution Note that the above plans will be prepared by the sub-contractor and will be a condition of appointment.</p>	<p>Optimisation of environmental and social management through formalised system. Labour unrest. Community unrest. Company reputational damage.</p>	EBRD PR1	EPC Contractor External consultants	EPC contractor's plans prior to start of construction	Construction ESMP & Sub Plans provided to Lenders and EBRD for review.	Open

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15.	Prepare operations ESMP Plans, including but not limited to: Community health and safety management plan. Community Benefits Plan. Hazardous Materials Safety. Exposure to Disease. Emergency Preparedness and Response. Biodiversity Management Plan Grievance Mechanism etc.	Optimisation of environmental and social management through formalised system. Labour unrest. Community unrest. Company reputational damage.	EBRD PR1	NBT resources External consultants	Prior to start of operations	Completed Operations ESMP provided to Lenders and EBRD for review.	Open
16.	EHS reporting to external parties.	Transparency and demonstration of compliance with EBRD standards.	EBRD PR1	NBT resources	Every three months during construction phase and annually (or every six subject to EBRD review) during the operational phase.	Regular reports completed submitted to EBRD for review.	Open

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PR2 Labour and Working Conditions							
17.	<p>Develop a Human Resources (HR) policy in compliance with PR2. The HR policy must include:</p> <ul style="list-style-type: none"> Prohibition of use of child and forced labour. Prohibition of discrimination. Freedom of workers to form or join workers' organisations. Requirements related to minimum wages, benefits, conditions of work and benefits. Provisions for retrenchment. A worker's grievance mechanism. Workers accommodation management plan. A commitment to cover non-employee workers. This commitment to apply the EPC contractor and subcontractors in workforce language. 	<p>Labour unrest. Child and forced labour, company reputational damage. Develop and implement an HR policy (this may be drawn from other existing NBT Wind Farm Projects). Translate HR policy in workforce language. Demonstrated opportunities for local community and women to benefit from the Project. Commitment within EPC contract to meet EBRD PR2 standards and adhere to and develop the plans identified. Monitoring reports of working conditions and accommodation.</p>	<p>EBRD PR2 Best practice Ukrainian labour legislation</p>	<p>NBT resources: human resource manager Responsibility: NBT HR manager</p>	<p>Prior to start of construction</p>	<p>Compliance.</p>	<p>Open</p>

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18.	<p>Site security arrangements to be developed in accordance with the IFC Good Practise Handbook - Use of Security Forces: Assessing and Managing Risks and Impacts Training for security guards in use of force and vetting for past offences</p> <p>Develop appropriate due diligence questionnaire for site security for review.</p>	<p>Community unrest, reputational damage, community health and safety risks.</p>	<p>EBRD PR2 Best practice</p>	<p>NBT resources EPC contractor</p> <p>Responsibility: NBT human resource manager, EPC contractor</p>	<p>Following EPC appointment</p>	<p>Training undertaken and security guards vetted. Completed due diligence questionnaire regarding site security to be provided to EBRD for review.</p>	<p>Open</p>
19.	<p>Develop and maintain construction worker accommodation buildings that are appropriate for their locations and that meet the requirements of IFC PS 2 and IFC/EBRD guidance note: Workers' accommodation: processes and standards. Develop a worker accommodation building management plan to ensure requirements are met.</p>	<p>Labour unrest. Community unrest, reputational damage, community health and safety risks.</p>	<p>EBRD PR2, best practice.</p>	<p>NBT resources External consultants</p>	<p>Prior to construction</p>	<p>Develop relevant management plan to ensure IFC PS 2 and IFC/EBRD guidance note: Workers' accommodation: processes and standards requirements are met at worker accommodation.</p>	<p>Open</p>

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PR3 Resource Efficiency and Pollution prevention control							
20.	Develop construction water availability / resource use assessment and management plan, addressing ability and capacity of existing local supply to provide construction requirements without impacting existing users for any groundwater utilised during the construction phase.	Conflicts with communities over water resources.	EBRD PR3, best practice	NBT resources External consultants	Prior to financial close	Provision of construction water resource use assessment and management plan.	Open
21.	Develop operational water availability / resource use assessment. Subject to results identify water management plan for operational phase.	Conflicts with communities over water resources.	EBRD PR3, best practice	NBT resources External consultants	Prior to construction commencing	Provision of operational water resource use assessment and management plan.	Open
22.	Operational noise monitoring and management plan to be developed. Undertake monitoring of noise during in construction and then operational phase. Ensure Noise levels within residential buildings is below 45 db (A) at night and 55 dB (A) during day. As necessary develop mitigation measures.	Conflicts with communities.	EBRD PR3, best practice	NBT resources External consultants	Prior to operation	Provision of noise monitoring plan.	Open
23.	Operational shadow flicker monitoring and management plan to be developed.	Conflicts with communities.	EBRD PR3, best practice	NBT resources External consultants	Prior to first disbursement	Provision of shadow flicker monitoring plan.	Open

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PR4 Health and Safety							
24.	Ensure Project contractors (EPC) have an appropriate management system in place which is accredited to OHSAS 18001 or equivalent.	Impacts to worker health and safety. Labour unrest.	EBRD PR2, best practice.	NBT resources External consultants	Prior to construction	Valid OHSAS 18001 certificate.	Open
25.	Develop a Community health and safety (H&S) management plan. Assign a Community H&S officer onsite responsible for preparing and enforcing a Community H&S plan.	Community safety and grievances.	EBRD PR4 International OHS standards	NBT resources External consultants Responsibility: NBT EHS manager, EPC contractor	Prior to start of construction	Completed community health and safety plan. Appointment of Community H&S officer.	Open
PR5 Land Acquisition, Involuntary Resettlement and Economic Displacement							
26.	Compile a land register. Obtain all land agreements for site infrastructure.	Project disputes.	EBRD PR5	NBT resources	Prior to financial close	Land register.	Open
27.	Conduct an assessment of land-use in areas affected by the construction and operations of the Project and compile a register of Project affected persons and/or communities including formal, informal and seasonal land users.	Project disputes.	EBRD PR5	NBT resources	Prior to financial close	Land register.	Open
28.	Develop a Livelihoods Restoration Plan (if additional land-use studies indicate that this is necessary, refer to point 5).	Project induced economic displacement, potential for unrest.	EBRD PR5	NBT resources	Within the 60 day disclosure period	Livelihoods Restoration Plan.	Open
29.	Develop Local Hiring Plan.	Economic hardship, loss of company reputation.	EBRD PR5	NBT resources External consultants	Prior to financial close	Local Hiring Plan.	Open

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30.	Clarify the potential for influx of job seekers and determine whether an Influx Management Plan will be necessary to manage this impact.	Increased strain on local infrastructure and services and potential for increased economic hardship, crime and conflict.	EBRD PR1	NBT resources	Within 30 days of initial disclosure	Updated ESIA provided to Lenders.	Open
PR6 Biodiversity Conservation							
31.	Provision of Spring Migration 2018 Supplementary Ornithology Report. Report to be disclosed.	Determining impact on species of conservation interest.	EBRD PR 6 Best practice	NBT resources External consultants	Within 60 day initial disclosure period.	Spring Migration 2018 Supplementary Ornithology Report.	Open
32.	Based on studies provide additional sensitive habitats maps within or adjacent to the Project site as part of cumulative assessment.	Determining impact on species of conservation interest.	EBRD PR 6	NBT resources External consultants	Prior to financial close	Sensitive habitat map.	Open
33.	Develop bat survey protocol and the monitoring and mitigation protocols implement the assessment and publish once a year the results of surveys as part of SEP.	Determining impact on sensitive habitats and species of conservation interest.	EBRD PR 6 Best practice	NBT resources External consultants	Prior to financial close	Survey protocol and updated ESMP.	Open

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34.	Undertake additional baseline data collection studies to allow for appropriate data on bird and bats, flora and fauna to further refine the ESMP and EHS management plans to limit impacts.	Assessment of Biodiversity and Living Natural Resources needs to define a mitigation strategy for direct and indirect impacts of the Project biological components.	PR6 /PS6 BAT Assessment in line with EUROBAT Guidance, Bird assessment in line the SNGH and Birdlife International Reference documents /guidance.	NBT with support from external consultants after the baseline data collection.	Start additional baseline data collection by April 2018.	Completed baseline studies by September 2018. Ongoing follow-up per ESAP.	Open
35.	Based on additional studies Developed Collision Risk Assessment (CRA) based on the Scottish National Heritage Model (SNH) to be developed by end of 2018, with initial draft by July 2018. Based on above Operate an Active Turbine Management and a Shutdown on demand system and operate the Project to ensure operations do not result in population impacts or mortality that will result in incremental mortality that exceeds thresholds as defined in the CRA.	Assessment of Biodiversity and Living Natural Resources needs to define a mitigation strategy for direct and indirect impacts of the Project biological components.	PR6 PS6 Bird assessment in line the SNGH and Birdlife International Reference documents /guidance.	NBT, with support from external consultants after the baseline data collection.	Draft bird collision risk assessment by July 2018. Final bird collision risk assessment by end 2018 Active turbine management system developed and refined prior to commissioning	Draft bird collision risk assessment by July 2018. Final bird collision risk assessment end of 2018. Active turbine management system by time of commissioning, to be updated within after 3 years of operation Ongoing follow-up per ESAP.	Open

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36.	<p>The Company will appoint an independent ornithological expert (IOE) to provide independent expert advice on ornithological aspects of the Wind Farm Project. The IOE will be appointed by the Company on a 3 year basis. The expert will be employed full time (and have adequate experience). The IOE will be appointed by the Company on a non objection basis by the Lenders.</p> <p>The Bird and Bat monitoring and survey protocols to be revised every 3 years by the IOE.</p>	The IOE will report on ornithological issues as required.	Lenders requirement	External consultants	2018 onwards	<p>Independent IOE appointed by NBT based on non-objection from Lenders. IOE re-appointed every 3 years. OIE to be member of Ornithological Society of Ukraine or BirdLife International, or equivalent.</p> <p>Ongoing follow-up per ESAP.</p>	

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37.	<p>The Company will shut down wind turbines on the basis of written Notice to Close issued by the IOE, although due to the requirement to provide immediate shut down in the field the first point of command will be via telecommunication links [Information on these instances will be provided to the Lenders within 3 days.</p> <p>Include in business plan 1 day shut down for wind turbines. Report on number of turbines and hours shut down in annual report to Lenders.</p>	<p>In order to reduce the risk of bird collisions, the wind farm will be shut down in the case of risk of bird collision. The IOE will provide written notice and keep a register of all such actions which will be immediately reported to the Lenders as well as local authorities. Summary of information will be published annually.</p>	PR6 /PS6	External IOE expert	<p>Operational phase</p> <p>Review of 1 day estimate for closure with the first findings on bird monitoring in July</p>	<p>Information on annual basis to Lenders on shut down actions and results.</p> <p>Ongoing follow-up per ESAP.</p>	
38.	Develop suite of ecological (biodiversity offset) enhancement measures to further support biodiversity in the area.	Impact on sensitive habitats and species of conservation interest.	EBRD PR 6 Best practice	NBT resources External consultants	Prior to financial close	Report on ecological enhancement measures and updated ESMP.	Open
PR 8: Cultural Heritage							
39.	Carry out detailed site archaeology survey as part of detailed design.	Protection of archaeology / cultural heritage resource.	EBRD PR 8 Best practice	NBT resources External consultants	Prior to construction	Updated ESIA.	Open
40.	Prepare archaeological / cultural heritage management plan for existing archaeology on site.	Protection of archaeology / cultural heritage resource.	EBRD PR 8 Best practice	NBT resources External consultants	Prior to construction.	Archaeological / cultural heritage management plan.	Open

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41.	Prepare chance find procedure.	Protection of archaeology resource during construction.	EBRD PR 8 Best practice	NBT resources External consultants	Prior to construction and operated during construction.	Chance find procedure.	Open
PR10 Information Disclosure and Stakeholder Engagement							
42.	Implement the Project Stakeholder Engagement Plan (SEP) and ensure that it includes all consultation and communication requirements contained in the Project ESIA, ESMP and ESAP. Update the SEP regularly including a full update upon completion of the supplementary ESIA document.	Company reputational damage. Loss of trust with community and unrest.	EBRD PR 10	NBT resources External consultants Responsibility: NBT environmental manager, CLO (if appointed in time)	Ongoing	SEP updates provided to Lenders and EBRD for review.	Open
43.	Undertake additional targeted consultation with land users and vulnerable groups. Results used to update ESIA social impact assessment.	Company reputational damage. Loss of trust with community and unrest.	EBRD PR 1 and 10	NBT resources External consultants	Prior to financial close	Updated ESIA to be provided to lenders.	Open
44.	Develop and implement an appropriate community grievance mechanism during construction and operations.	Company reputational damage. Loss of trust with community and unrest.	EBRD PR 10	NBT resources External consultants	Prior to financial close.	Grievance mechanism developed and included in SEP.	Open

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45.	Disclose the ESIA for 60 days public consultation in English and relevant local languages (Russian and Ukrainian). English language versions will prevail in case of discrepancies due to translation.	Company reputational damage. Loss of trust with community and unrest.	EBRD PR10	NBT resources External consultants Responsibility: NBT environmental manager, CLO (if appointed in time)	Prior to financial close	Disclosed ESIA as per SEP.	Open