

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

PROJECT: P-Z1-GB0-040: AXIAN TELECOM

General considerations

1. Axian Telecom is planning to implement the Axian Telecom Medium-Term Business Plan 2024-2030 Project (the *Project*). The Bank is considering providing financing, implementation support and monitoring for the Project.
2. Should the Bank provide financing, Axian Telecom will implement measures and actions of this Environmental and Social Management Plan¹ (*ESMP*) so that the Project meets all the requirements of the Bank Environmental and Social Operational Safeguards (*OS*) and the National policy and legal requirements.
3. Where the ESMP refers to specific plans, whether they have already been prepared or are to be developed, the ESMP requires compliance with all mandatory provisions of such plans.
4. The table below summarizes the material measures and actions that are required, the basis of the requirement, the timing of the measure or action, and the criteria to be used for determining whether the required measure or action has been successfully achieved. Axian Telecom is responsible for compliance with all requirements of the ESMP even when implementation of specific measures and actions is conducted by an entity different from the Holding Company or its Subsidiaries.
5. Implementation of the material measures and actions set out in this ESMP will be monitored and reported to the Bank by Axian Telecom as required by the ESMP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the measures and actions throughout implementation of the Project.
6. As agreed by the Bank and Axian Telecom, this ESMP may be revised from time to time during Project implementation, to reflect adaptive risk management of project changes and unforeseen circumstances or in response to assessment of project performance conducted under the ESMP itself. In such circumstances, Axian Telecom will propose and agree changes with the Bank, and then update the ESMP to reflect such changes.

¹ The ESMP refers to all the E&S risks/impacts and measures, as approved in all the disclosed E&S documents and agreed between the Bank and Borrower. For projects involving multiple subprojects, that are identified, prepared and implemented during the course of the project, the Borrower will need to demonstrate to the Bank, before the project appraisal, through the preparation of E&S documentation of a sample of subprojects, that it has the capacity to carry out appropriate environmental and social assessment of subprojects, and prepare and implement such subprojects in accordance with the national laws and the OSs. (*Section III.2.3 of Bank's ESP and section D of OSI*)

<i>Material Actions to Manage the Project's E&S Risks and Impacts</i>		<i>Basis for Requirement</i>	<i>Key Performance Indicator</i>	<i>Indicative Timing/Deadline</i>
1	Periodic E&S implementation report to the Bank	Bank's ESP and OS1	Timely submission of quarterly and annual E&S performance reports.	Quarterly, 15 days after end of each quarter; Annually, end of Q1 for the previous year's performance.
2	Recruitment of E and S specialists as part of the Project implementation unit	Disclosed ESIA, OS1	Axian Telecom E&S unit organogram; CVs of the personnel recruited.	Maintained throughout project duration.
3	Establishment of the Project Grievance Redress Mechanism (GRM) and disclosure to Public	OS1, OS10 and National requirements	Axian Telecom GRM Manual and disclosure link.	Maintained for entire project period and reported quarterly.
4	Payment of compensation and reinstallation of affected people	SO10	Axian Telecom Resettlement procedure. PAP consent forms; Proof of payment to PAPs e.g signed forms confirming receipt of funds.	Prior to site works, per compensation schedule; Annually reported (part of annual Sustainability report)
5	Incorporation of site-specific E&S measures in the request for proposals	SO1 & national requirements	Axian risk assessment and categorization. ESIA, and RAPs conducted. ESIA approvals by national authority.	Annually (part of annual Sustainability report)
6	Submission of high-risk activity's Contractor ESMP (<i>C-ESMP</i>) to Bank clearance	Bank's ESP and OS1	N/A	N/A
7	Establishment of the Contractor's Grievance Mechanism (GM) and information of workers	OS1, OS2, SO10 and Bank's Disclosure and Access to Information Policy	Contractor GRM manual. Proof of publication/disclosure to workers.	Prior to contractor mobilization and reported quarterly
8	Obtaining nationally required licenses prior commencement of subjected activities (excavations, tree-cutting, working at height, working in confined spaces, etc.)	OS1, OS2 and national labor laws	Axian Telecom HSES guidelines disclosed. Relevant national permits obtained that	Prior to commencement of relevant activities; and reporting quarterly.

			include ESIA approvals, construction permits, OSHA permits, fire, health, waste disposal permits etc.	
9	Preparation, approval, and disclosure of specific E&S documents during Project implementation, including prior review of Category 1 terms of reference by the Bank	Bank's ESP, OS1 and national requirements	N/A	N/A
10	Engagement with concerned stakeholders of each relevant specific E&S activity	OS1, OS10, Bank's Disclosure and Access to Information Policy	Records of engagements / public consultations including issues raised, and how these were addressed. Numbers of stakeholders consulted categorized by gender, and vulnerability.	Continuous engagement with reporting annually
11	Establishment of Emergency Preparedness and Response mechanism	OS1 & OS4, national legislation on contingencies et	Axian Telecom has a EPRM procedure, which every subsidiary complies with.	Annual reporting
12	Appropriate and timely handling of complaints/grievances	Bank's ESP and OS1	Grievance register showing number of complaints, types, closed, pending, escalated to other levels including court. Closure forms.	Ongoing with quarterly reporting
13	Notification to riparian or alert to downstream exposed peoples	Bank's ESP and OS1, applicable International Treaty/Convention ratified	N/A	N/A
14	Capacity building of key project implementers	OS1	Training manuals. Number of trainings conducted, by type. Number of those trained by gender, location, and project.	Continuous with annual reporting

15	Suspending works in the event of EOHS risk or incident, immediately notify the Bank, and resume works only upon no-objection of the Bank.	Bank's ESP	Incidents register; Work stop orders or suspension; Proof of notification of the incidents and accidents.	Immediately and no later than 72 hours after the occurrence
16	Prepare the root-cause analysis (RCA) of any fatal EOHS incident and implement the Corrective Action Plan (CAP).	Bank's ESP and OS1	Incident report and notification. Finalized RCA. Finalized CAP.	28 days after incident occurrence.
17	Disclosure of Project's E&S reports to the public	OS1, OS10, Bank's Disclosure and Access to Information Policy	Annual sustainability report disclosed; Annual Environmental & Social Compliance Audit	Annually