

VOLUME 3 FRAMEWORK FOR ENVIRONMENTAL AND SOCIAL MANAGEMENT

Environmental and Social Impact Assessment

Six Flags Qiddiya Theme Park



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LIST OF DEFINITIONS

To improve readability for all audiences, documents will avoid the use of jargon, acronyms, and abbreviations.

Acronym / Abbreviation	Definition
Area of Influence	The Area of Influence encompasses the project site(s), the area beyond the project site that may be dependent on the project; and buffered areas potentially impacted by cumulative impacts between the Project residual effects and the effects of nearby projects or activities.
Assessment, ESIA	Assessment is the Effects Assessment, with the included consideration of Environmental, Socio-economic, and Cultural considerations. Assessment is the Environmental and Social Impact/Effect Assessment (ESIA), with the included consideration of Environmental, Socio-economic, and Cultural topics.
Effects or Impacts	Used of these terms is interchangeable and indicate a change in some measure related to the natural or human environment, including physical, biological, social, economic, or cultural conditions and the positive and negative consequences of these changes
Secondary Area of Influence Local Assessment Area (LAA),	This is defined as the Project Development Area and the area outside the Project Area, where there may be measurable changes to the natural and human environment resulting from the Project and proposed activities, and where there may be associated facilities that are not funded as part of the project and whose viability and existence depend exclusively on the Project. The Local Assessment Area includes the area where there is a reasonable potential for the Project or Project-related activities to interact with and potentially have an effect on the valued components. The Local Assessment Area will depend on the valued component being considered.
Primary Area of Influence Project Development Area (or PDA)	This area encompasses the area that will be occupied by the Project components and activities. The Project Development Area is the project footprint, or the area where project activities would be undertaken including the facilities and infrastructure.
Project or SFQP	Six Flags Qiddiya Amusement Theme Park
Tertiary Area of Influence Regional Assessment Area (RAA)	These are the areas where there could be interactions from Project residual effects, i.e., effects that are not completely eliminated by mitigation measures, and the residual effects from reasonably foreseeable future projects and human activities. This spatial scale will be a wider area of interest and will provide context for potential effects in the Local Assessment Area. A project inclusion list or relevant projects or activities will be developed for cumulative effects assessments consideration.
Valued Component	This is a factor, topic, or element of the natural or human environment that is of interest to the Proponent, Lenders, future Operators, Regulators, and Stakeholders, and that will undergo an effects assessment.

LIST OF ACRONYMS

*This list will be checked against the document.

Symbol / Unit of Measure	Definition
AOI	Area of Influence
CE(S)MP	Construction Environmental (and Social) Management Plan
EHS	Environment, Health and Safety
ESIA	Environmental and Social Impact Assessment
ENVID	Environmental Impact Identification
EP	Equator Principles
FCEMP	Framework Construction Environmental Management Plan
GAMEP	General Authority of Meteorology and Environmental Protection
GER	General Environmental Regulations
GIIP	Good International Industry Practice
ha	hectares
IEMA	Institute of Environmental Management and Assessment
IFC	International Finance Corporation
IFI	International Finance Institutions
ILO	International Labour Organisation
KSA	Kingdom of Saudi Arabia
MoC	Ministry of Culture
MEWA	Ministry of Environment, Water and Agriculture
NCEC	National Center for Environmental Compliance
NCWM	National Centre for Waste Management
NMC	National Centre for Meteorology
NCW	National Centre for Wildlife
NCVD	National Centre for the Development of Vegetation Cover and Combatting Desertification
OE(S)MP	Operational Environmental (and Social) Management Plan
OECD	Organisation for Economic Co-operation and Development
PDA	Project Development Area
PME	Presidency of Meteorology and Environment
PM	parts per million
PS	Environmental and Social Performance Standards
SGD	Sustainable Development Goals
SFQP	Six Flags Qiddiya Amusement Theme Park
SCTH	Saudi Commission for Tourism and Heritage
SWA	Saudi Wildlife Authority
t	tons
WBG	World Bank Group

15 INTRODUCTION

Qiddiya Investment Company (QIC or the Proponent); which is part of the Public Investment Fund (PIF) of the Kingdom of Saudi Arabia (KSA), is developing a flagship entertainment, sport and cultural destination referred to as Qiddiya. As part of its wider development, QIC is seeking to develop the Six Flags Qiddiya Amusement Theme Park (hereafter SFQP or the 'Project') which will serve as a key entertainment attraction for Qiddiya. The Project will cover an area of 320,000 m² and will feature 28 rides and attractions of which 10 will be thrill rides, with 18 rides designed for families and young children.

15.1 Overview

The Framework for Environmental and Social Management (hereafter 'the Report') forms Volume 3 of the Project's Environmental and Social Impact Assessment (ESIA). This Report has been developed to provide a framework of the systematic processes and procedures for developing and implementing the overarching Environmental and Social Management System (ESMS) for the lifetime of the Project. This Report has been informed by the findings of the ESIA Report (Volume 2) and has been developed to establish the structures for mitigation and management of the identified environmental and social risks and impacts throughout the construction, operation and decommissioning of the Project.

In order to implement the mitigation and management measures identified in the ESIA Report, Project specific environmental and social management plans (ESMP) will be developed to provide the mechanism to implement the measures. The ESMPs will also be produced to meet the requirements of the National Centre of Environmental Compliance (NCEC) as well as the Project Lenders. The ESMP will summarise the Proponent's commitments to mitigate and monitor the risks and impacts identified in the ESIA through measures to avoid, manage, reduce and if, required, compensate/offset impacts. The ESMPs will include Project-specific Construction Environmental and Social Management Plan (CESMP) and Operation Environmental and Social Management Plan (OESMP) as well as any other complimentary plans and procedures identified by the ESIA.

16 ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM

16.1 Development of the Environmental and Social Management System

An ESMS is designed to provide a systematic structure to facilitate the effective implementation and management of environmental and social risks and impacts throughout the lifetime of a Project. A key objective of an ESMS is to ensure that appropriate environmental and social policies and procedures are in place and being adhered to. The ESMS should allow for continual improvement through on-going reviewing, correcting and improving of the system. This is commonly applied through a Plan-Do-Act-Cycle as presented in Figure 16-1.



Figure 16-1 Implementation and Requirements of the ESMS

The following are considered to be fundamental components of a robust ESMS:

- Establishment of ownership, identifying targets and budgets and methods of data gathering at initial implementation of the ESMS;

- Development of Project specific policies that relate to environmental and social considerations e.g., labour, human resources (HR), stakeholders and affected persons and communities;
- Identification of applicable environmental and social legal requirements and other compliance obligations i.e., those required by Project Lenders;
- Involvement of environmental and social professionals with the necessary experience and skills to assess and manage the environmental and social impacts and risks;
- Prioritisation of management programmes and strategies with the objective of achieving reduction of risk to human wellbeing and the environment;
- Favour approaches that eliminate the impact at source e.g., selection of less hazardous materials;
- Allocation of adequate staff and financial resources to provide training to workers, local communities and stakeholders to effectively and safely respond to and manage emergencies and accidents;
- Commitment to continual improvement of environmental performance through ongoing monitoring, review and refinement of performance ranges.

The Project ESMS documentation will be ‘living’ documents and will need to be updated and refined when required to ensure continuous improvement e.g., due to Project changes, activities, environmental sensitivities and future requirements defined by the relevant regulatory authorities and Project Lenders.

16.2 Structure of the Environmental and Social Management System

The structure of the ESMS that will be implemented for the construction and operation of the Project is presented in Figure 13-2.

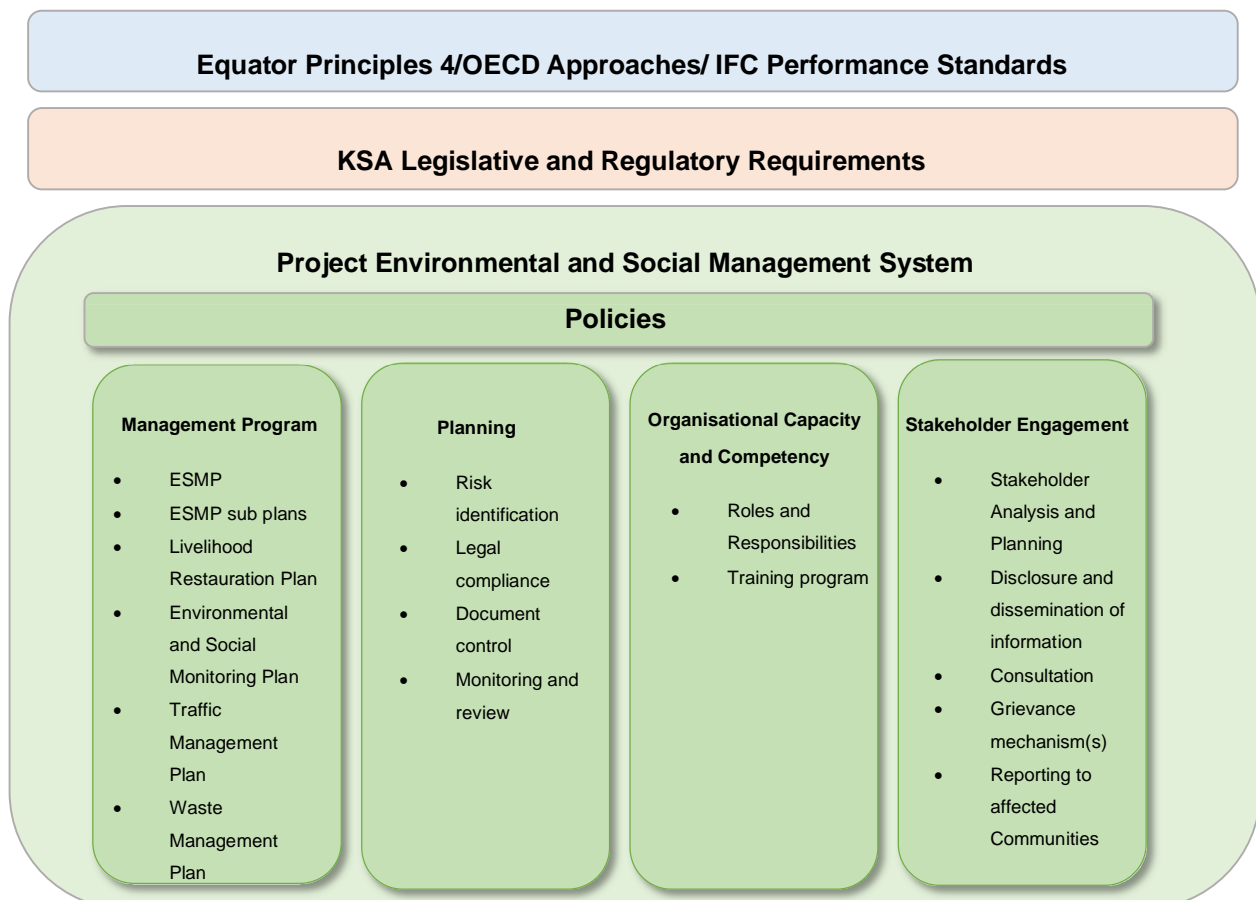


Figure 13-2 Structure of ESMS

16.3 Environmental and Social Management System Scope

The Project will develop and implement a separate ESMS for the respective construction and operational phases. The scope will need to include:

- Applicable activities and timescales for construction and operation;
- Compliance with applicable national regulation, lender requirements and loan covenants;
- Detailed mitigation and management measures required following construction, commissioning and operational impacts identified from the ESIA;
- Roles and responsibilities for appropriate management organisational units;
- Boundaries of the ESMS (i.e., this will include the Project site and may include associated facilities, temporary storage areas or other storage areas, warehouses etc.);
- Key risks and management requirements related to primary supply chains (which can reasonably be managed), and;
- Requirements for monitoring and reporting, including measures for inspection audit, review and preventative action.

16.4 Development of Construction Environmental and Social Management System

The construction phase ESMS will be developed and implemented by the appointed construction Contractor and will cover all potential environmental and social risks and impacts associated with the Project's construction (including potential impacts from subcontractors and the supply chain that can be influenced by the main Contractor).

The construction phase ESMS will also comprise other plans, documents, data, forms, records etc. affiliated with the construction phase of the Project that are supplementary to and defined by the CESMP.

The CESMP will be prepared, reviewed and submitted to the Project Lenders prior to the commencement of construction.

16.5 Development of Operation Environmental and Social Management System

The operation phase ESMS will be developed and implemented by the appointed operations Contractor and will cover all potential environmental and social risks and impacts associated with the Project's operational phase (including potential impacts from subcontractors and the supply chain that can be influenced by the operations Contractor). The operational phase ESMS will also comprise other plans, documents, data, forms, records etc. affiliated with the operation phase of the Project that are supplementary to and will be defined by the OESMP.

The OESMP will be prepared, reviewed and where necessary approved by Project Lenders prior to the commencement of operation.

16.6 Corporate Environmental and Social Management System

A QIC Corporate ESMS is currently under development, the intention of this ESMS is to ensure consistent and well-structured management of environmental and social aspects across all QIC projects and programs. All existing QIC manuals and procedures are being reviewed as part of this process to identify any compliance gaps with the IFC Performance Standards.

A corporate level ESMS will be prepared for QIC to align with the requirements of *IFC Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts* and the

Environmental and Social Management System Implementation Handbook. It will also consider *ISO 14001:2015: Environmental Management Systems – Requirements with Guidance for Use*, specifically for environmental requirements.

The corporate level ESMS will provide a systematic and ongoing set of management processes using appropriate methods and tools to enable QIC to proactively manage their environmental and social performance and consistently implement Qiddiya's environmental and social policies and objectives. The ESMS is part of the management system with the specific purpose of managing and fulfilling all environmental and social aspects, compliance obligations and risks and opportunities.

QIC's ESMS will include documented information comprised of their Environmental and Social Policy Statement; ESMS Manual; ESMS documents and records required by the reference Standards and other documents and records to ensure effective planning, operation and control of ESMS processes.

16.6.1 Environmental and Social Policy

The Environmental and Social Policy outlines QIC's management's commitment to environmental impact prevention and management as well as enhancement of social responsibility for all QIC projects and programs and through all QIC organisation, contractors (including consultants), suppliers and visitors. It also provides a framework for setting environmental and social objectives.

16.6.2 Environmental and Social Management System Manual

The ESMS Manual is part of the Program to be undertaken by QIC. The main objective is to provide a description of the overall strategies and processes of the QIC ESMS. The Manual provides the ESMS basis, including description of QIC ESMS processes, resources and arrangements, definition of the roles and responsibilities of the different parties for ESMS activities and references to associated plans, procedures and templates. It is an overarching manual that applies throughout all phases, projects and intervenient of QIC program.

16.6.3 Plans, Procedures and Bulletins, Templates and Records

QIC's ESMS includes several documents and records required by reference standards, the Manual and other to ensure the effective implementation of ESMS processes through all overall QIC Program.

- **ESMS Plans:** the overarching ESMS plans provide the basis and set the framework for the development and implementation of project specific ESMS processes and documents, including those implemented by Contractors and Consultants. Among others, this includes CESMP, OESMP; Safety Management Plan; Construction Safety Manual; Emergency Management Plan;
- **ESMS Procedures:** the procedures outline specific requirements and instructions for Contractors and Consultants to manage environmental and social activities across the QIC Program. As examples: Document Control Procedure; Environmental and Social Risks and Impacts Assessment; Action Plan Charts; External Communications; Internal Audit; Accident / Incident Reporting and Investigation.
- **ESMS Templates:** Templates are created to support the preparation of some specific documents and/or assure consistent records. As examples: Procedures' template; Environmental and Social Risks and Impacts Assessment template; Site Environmental and Social Checklist; Environmental and Social Audit Report template; Observations Log template; Complaints Register template.
- **ESMS Records:** Records are generated to express obtained results or provide evidence of ESMS implementation. So, overarching records are maintained to demonstrate conformance with ESMS requirements and the effective ESMS operation throughout the overall QIC Program. As examples:

Environmental and Social Risks and Impacts Assessment; Communications Log; Observations Log; Complaints Register

16.6.4 Project Specific Documents, including Contractors Documents

QIC ESMS documentation will also include Project specific documents, namely Contractors and Consultants environmental submissions, such as environmental and social plans i.e. CESMP, OESMP, Health, Safety and Environmental Plan (HSEP), work instructions, method statements, reports, records and external documents, which shall be reviewed by QIC or Consultants on its behalf.

17 POLICIES

The construction and operation phases of the Project will need to develop clear statements that define policy with regards to environmental and social issues.

17.1 Corporate Policies

QIC has established several corporate plans and policies that are relevant to the environmental and social management and performance of the Project. These policies will need to be adapted by the Project Proponent to ensure full inclusion of all environmental and social elements. As detailed above, a review and update of all QIC manuals and procedures is being conducted in parallel to the ESIA process to ensure compliance with the IFC Performance Standards. The existing QIC corporate policies include the following:

- Qiddiya Environmental Sustainability Policy (currently being updated to incorporate social aspects);
- Qiddiya Accident / Incident Reporting and Investigation;
- Qiddiya Health, Safety and Environmental Training Matrix;
- Qiddiya Safety Management Plan

17.2 Contractor Policies

During construction and operation of the Project, separate policies plans and procedures relating to assessment, monitoring and control of environmental and social aspects will be prepared and implemented at the relevant phase of the Project. Environmental and social policies from the main construction and operation contractor will be incorporated into the ESMS, CESMP and OESMP for the relevant phase of the Project. This will need to align with all QIC corporate policies and procedures.

The following documents have been produced by the construction Contractor for the Project:

- Project Safety, Health and Environment Management Plan;
- Project Health and Safety Policy Statement;
- Project Construction Environmental Management Plan;
- Project Construction Waste Management Plan;
- Project Security Management Plan;
- Project Hazardous Materials Procedure;
- Project Emergency Response Plan; and
- Project Fire Management Plan.

18 LEGAL AND REGULATORY COMPLIANCE REQUIREMENTS

An important component of identifying and evaluating relevant environmental and social risks and impacts is defining the legislative framework within which the Project will operate. This includes the relevant legislation in KSA as well as the international requirements.

The Project Proponent will prepare and maintain a Legal Requirements Register which will set out the relevant KSA and international environmental and social legislation and regulatory requirements. The Legal Requirements Register will be reviewed and amended as necessary every 6 months to reflect updates and changes in local and/or international legislative and regulatory requirements. Volume 2 of the ESIA outlines the legal and institutional framework for the Project.

18.1 Identification of National Legal Requirements

During the development of the ESMS, the applicable environmental and social legal requirements should be identified and documented. For the Project, this will include:

- KSA legislation and regulations; and
- International treaties and conventions that KSA is a signatory to.

18.2 Identification of ESIA Requirements

Volume 2 of the ESIA has outlined the Project specific mitigation, management and monitoring measures that will need to be incorporated into the construction and operation phases of the Project. Assuming approval of the ESIA by the regulatory authority and/or the Project Lenders, the mitigation, management, and monitoring measures are conditions of the approval.

18.3 Identification of Requirements from the Competent Authority

NCEC is the Competent Authority responsible for ensuring the environmental protection of KSA, implementing the legislation and issuance of Environmental Permits. The Environmental Permit issued by NCEC must be reviewed to ensure that all construction and operation phase conditions are established and implemented accordingly. Non-compliance with the conditions of the Environmental Permit may result in a breach of legislation and permitting requirements. The Environmental Permit will be maintained as part of the ESMS.

18.4 Identification of Requirements from the Project Lenders

The Project will be seeking project finance from one or more IFIs who are expected to be signatories to EP4 and the OECD and will align themselves with the IFC PS, or other consistent internal environmental and social investment policies. The ESIA will therefore be undertaken in accordance with the lender requirements which are expected to include the following:

- The EP4 (EP Assoc., 2020)
- OECD Recommendation of the Council on OECD Legal Instruments Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence (The "Common Approaches") (OECD, 2022);
- IFC Performance Standards (IFC, 2012);
- WBG / IFC General and Sector Specific EHS Guidelines (World Bank, 2017)

The International Finance Institutions (IFI) that will be providing finance to the Project will establish an Environmental and Social Action Plan (ESAP). The ESAP will be produced in response to the ESIA to

identify the environmental and social requirements for Project, these may be commensurate with or supplementary to the ESIA. The ESAP is a tool used by the IFIs to ensure that any outstanding environmental and social issues at the time of the transaction approval are resolved in a timely and appropriate manner. The ESAP ensures compliance with the environmental and social requirements of the Project Lenders and the local legislative requirements.

During the development of the ESMS, the ESAP must be reviewed to ensure that all related conditions are included for compliance management. It is highlighted that non-compliance with the requirements of the Project Lenders may impact financial disbursement and other factors.

To ensure the Project Proponent's compliance with Principle 8 of EP4, the following environmental and social covenants are applicable to the Project:

- The Project Proponent will comply with all Project related ESAP, ESMPs and the Project ESMS during the construction and operation of the Project
- The Project Proponent will provide regular third-party environmental and social compliance audits and reports, the format and frequency as agreed with by the Lenders (e.g., bi-annually). The audit process will document compliance with the Project's ESAP, ESMPs, ESMS and national requirements for environmental and social laws, regulations and permits.
- The Proponent will be responsible for decommissioning the facilities in accordance with an agreed upon decommissioning plan and in compliance with the national and local regulatory requirements of the time.

19 IDENTIFICATION OF RISKS AND IMPACTS

To appropriately manage the Project, an understanding of the potential environmental and social risks and impacts is required. An important stage in the development of the Project's ESMS is the development of a Project specific risks/aspects register which collates the predicted environmental and social risks and impacts associated with the construction and operation of the Project.

19.1 Assessment of Risks

Volume 2 of the ESIA has identified and assessed the predicted environmental and social risks and impacts associated with the development of the Project. The risks and impacts were identified based on the understanding of the Project at time of writing i.e., in accordance with the known Project construction and operation methods and the available baseline information and data.

During construction and operation of the Project there will be ongoing monitoring of environmental, social and health and safety aspects, reviews of compliance with the ESMS and an evaluation of the effectiveness of the ESMS. These monitoring events and reviews provide opportunities to review the environmental and social aspects of the Project, determine whether the appropriate controls are working or need to be improved. In addition, they will help to identify any new aspects.

19.2 Risks/Aspects Register

The risks/aspects register will be developed by the Project Proponent and will be a live document throughout the Project's lifetime. The risks and impacts identified in the register are expected to align with those identified and assessed in Volume 2 of the ESIA. However, there may be a requirement to update the register during the lifetime of the Project. As a result of Project changes i.e., change to construction and operation methods, changes to baseline status, limited baseline information etc. there may impacts and/or risks not identified by the ESIA process that will need to be incorporated into the register.

The register will be reviewed as part of the ESMS review process or sooner if there is change to construction and/or operation methods and activities. In this case, the related aspects / risks will be added / updated as required.

20 MANAGEMENT PLANS AND PROCEDURES

Volume 2 of the ESIA has delineated the complimentary environmental and social management plans that will be developed for the construction and operation of the Project. These complimentary plans and procedures include those linked to specific activities that carry environmental and social risks, for which defined and documented management processes need to be specified. The plans will include specific, measurable, achievable, relevant, and time-based targets (SMART) and, where applicable, Key Performance Indicators (KPI) with distinct milestones. The plans will also specify who is responsible for achieving these targets.

The CESMP and OESMP will form the key plans that drive the environmental and social management of the Project. Based on the findings of the ESIA, these documents will identify the scope, objectives, risks, responsibilities, desired outcomes, and associated monitoring requirements of the ESMS.

20.1 Construction Environmental and Social Management Plan

The CESMP will form a stand-alone document that will be produced and managed by the construction Contractor. The CESMP will be structured to detail how environmental risks, impacts, opportunities and constraints will be managed and monitored during the construction of the Project. The CESMP forms the overarching, principal document of the ESMS for the construction phase of the Project.

The CESMP will be produced by the appointed Contractor to fulfil the following key objectives:

- Clarify the roles and responsibilities of the Proponent, appointed construction Contractor and sub-contractors;
- Provide a mechanism to ensure that the mitigation measures defined within the ESIA are fully implemented;
- Detail the methods and controls the appointed construction Contractor will employ to safeguard the environment and mitigate predicted impacts;
- Enable the Project to comply with its legislative requirements and meets its environmental and social objectives;
- Define the roles and responsibilities of the key personnel involved in the management of environmental and social issues;
- Consider how waste generated during construction might be reduced, reused or recycled;
- Detail the correct disposal of hazardous or chemical waste;
- Enable the Proponent to focus upon priority environmental and social issues during the construction process and maintain high levels of environmental and social awareness amongst the Project team; and
- Provide details of the environmental monitoring programme and a draft plan for the frequency, type, and method for monitoring (such as noise) and report analysis demonstrating mitigation of environmental issues.

Once the ESIA is completed and approved, the draft CESMP will be prepared. The CESMP must be approved by NCEC and the Project Proponent prior to the start of construction works. The CESMP will need to consider the following:

- The outcome and mitigation and monitoring commitments of the final approved ESIA;

- The conditions and notes within Environmental Permit issued by NCEC for the Project;
- The Contractor's detailed Construction Works Method Statement; and
- Related best available technologies and experiences.

It should be noted that initial construction activities across the Project site have already commenced and there is a CESMP currently in place for these works. The CESMP will be updated to include the additional environmental and social mitigation and monitoring requirements commitments of the ESIA.

20.2 Operational Environmental and Social Management Plan

The OESMP will form a stand-alone document that will be produced and managed by the operations Contractor. The OESMP will be structured to detail how environmental risks, impacts, opportunities, and constraints will be managed and monitored during the operation of the Project. The OESMP forms the overarching, principal document of the ESMS for the operations phase of the Project.

The OESMP will fulfil the following key objectives:

- Provide effective, site-specific, and implementable procedures to monitor and control environmental and social impacts throughout the operation phase of the Project;
- Ensure that events, processes, or activities do not adversely impact health, safety, amenity, traffic, or the environment in the surrounding area;
- Ensure that environmental studies that have been previously submitted to and approved by the relevant authorities have been properly implemented, including each plan's conditions for approval or consent;
- Facilitate the implementation of environmental control measures during operation;
- Define the roles and responsibilities to facilitate environmental protection during operation; and
- Provide feedback for continual improvement in environmental performance of the Project.

Following implementation, the OESMP will be regularly reviewed throughout the operational phase.

The framework OESMP provided will provide a description of the following:

- Environment, Health and Safety (EHS) Management Organizational Structure;
- Roles and responsibilities;
- Training and awareness;
- Dealing with complaints;
- Environmental control procedures;
- Environmental incident investigation and reporting;
- Monitoring, compliance, and audit reports;
- Environmental performance records; and
- Management review of the OESMP Complimentary Plans and Procedures

In alignment with the predicted risks and impacts of the Project, there is expected to be the requirement for further complimentary plans that will be linked to the CESMP and OESMP. These plans will be developed to outline the management and working procedures associated with the relevant topic. Table 17-1 sets out these plans and provides a summary of the key content requirements for each plan. The specific content of each plan will be dependent on the final CESMP and OESMP and will relate to specific working methodologies, responsibilities, and site activities.

Table 17-1 Summary of the requirements for the complimentary plans.

Plan	Project Development Phase	Purpose and Key Requirements
Waste Management Plan	Construction & Operation	To identify Project specific requirements for waste and wastewater management, containment of wastes (segregation, storage area specifications and locations), collection methodologies & transport (identification of licensed contractors and the process to engage), treatment/disposal (identification of licensed treatment and disposal sites), record keeping, and reporting requirements related to waste.
Hazardous Material Storage and Handling Plan	Construction & Operation	To identify locations for hazardous material storage, storage requirements (specifications of bunds and buildings/warehouses to ensure environmental and H&S protection, segregation requirements etc.) and handling procedures to minimise environmental and OH&S risks. The plan will outline record keeping as per chain of custodies, requirements for MSDS and roles & responsibilities. Specific method statements regarding the handling of materials will be detailed, as well as training requirements for staff involved in such activities.
Traffic Management Plan	Construction & Operation	The plan will identify specific requirements for heavy, or oversized loads, including timings of deliveries, specific routes (to minimise disruption), engagement mechanisms with external transport authorities (as per the SEP, e.g. local government and stakeholders). To include measures to minimise congestion, fuel use and risks to the public and site staff.
Spill Response and Contingency Plan	Construction & Operation	Identify site specific requirements for response to pollution incidents. To include the identification of high-risk areas on a plan and the location of spill kits (and contents of spill kits). To identify required contact details in the event of an incident and contractors that are available on a quick response contract to assist with clean up. Where necessary this will link with the SEP for any external communications. To identify staff that require training in regard to the plan. The plan will include provisions for recording of any incidents in a separate register, to ensure close out and implementation of corrective and preventative actions.
Emergency Response and Preparedness Plan	Construction & Operation	To identify the contingencies put in place for a variety of potential emergency situations relevant to the commissioning or operational phases. The plan will outline the response mechanisms, roles and responsibilities, training requirements, internal communication, equipment and relevant engagement with external stakeholders.

Plan	Project Development Phase	Purpose and Key Requirements
		Requirements for on-site equipment shall be established based upon the potential emergency risks, including training provisions for site personnel regarding such equipment.
Chance Find Procedure	Construction	To identify the process for identifying and responding to a potential find of archaeology when commissioning or operational activities are being undertaken near the archaeological site within the Project site and near archaeological sites outside the project site. It shall include the process for sectioning off the potential artefact and external communication with the Heritage Commission which forms part of the Ministry of Culture.
Pest Management Plan	Construction & Operation	To outline specific mitigation and management measures to manage pests attracted to the Project site as a result of poor housekeeping. Where practical, the plan will also outline measures to minimise the use of pesticides.
Environmental and Social Monitoring Plan	Construction & Operation	Monitoring is required to demonstrate compliance to KSA environmental standards and lender requirements. The monitoring plan is to specify monitoring requirements for all ESIA parameters (as specified in Volume 2 of the ESIA as a minimum). The plan will therefore need to include: <ul style="list-style-type: none"> • What parameters need to be monitored and measured and at what locations. • The methods for monitoring measurement, analysis and evaluation to ensure valid results. • The criteria against which compliance and performance will be measured. • When and at what frequency monitoring needs to be performed. • How the results from monitoring and measurement will be analysed and evaluated (independent or internal).
Stakeholder Engagement Plan	Construction & Operation	To identify Project stakeholders, identify communication protocols for engagement with stakeholders. To identify frequency or event-based communication with stakeholders (i.e., for emergencies and specific grievances). To detail the grievance mechanism or provide a reference to a separate grievance mechanism or external parties. All Project workers will be provided with training to be made aware of their role in the stakeholder engagement and community grievance process.
Grievance Mechanism	Construction & Operation	To be included within or linked to the SEP. To identify the procedure for all site staff to be able to raise issues, concerns and opportunities for improvement for any aspect of their employment on the project. To develop and identify the process for external parties to raise grievances regarding the project. The mechanism shall be easily accessible (including for any vulnerable groups), non-discriminatory and provide a transparent process to raise concerns or

Plan	Project Development Phase	Purpose and Key Requirements
		complaints, which may be issued in an anonymous nature. The mechanism shall specify the roles and responsibilities of internal staff about the grievance mechanism and the procedure for responding to received grievances, including the timeline for response, engagement mechanisms and recording of records.
Security Plan	Construction & Operation	A Security Plan will be developed based on the outcomes of a security risk assessment. It is noted that security arrangements will be guided by UN Code of conducts for law enforcement. Security personnel will follow a strict code of conduct and will be trained in weapons handling (if applicable), human rights and receipt of grievances.
Occupational Health and Safety	Construction & Operation	Identify the required controls for worker health and safety during the commissioning and operational phases. As a minimum, this plan shall include: <ul style="list-style-type: none"> • Means of identifying and minimising, so far as reasonably practicable, the causes of potential hazards to workers. • Provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances. • Provision of appropriate equipment to minimise risks and requiring and enforcing its use. • Training of workers, and provision of appropriate • incentives for them to use and comply with health and safety procedures and protective equipment. • Documentation and reporting of occupational accidents, diseases and incidents. • Emergency prevention, preparedness and response arrangements.
Human Resources Policy	Construction & Operation	Human resource policies and procedures will be adapted appropriate to the size of the workforce required for operation and maintenance requirements. Policies and procedures must be prepared to demonstrate consistency with the requirements of national legislation and IFC PS 2.

Plan	Project Development Phase	Purpose and Key Requirements
<p>Working Conditions and Terms of Employment Procedure or Labour Management Plan</p>	<p>Construction & Operation</p>	<p>The Construction and Operations Contractors will provide a plan detailing how working conditions and terms of employment are compliant with KSA labour, social security and occupational health and safety laws.</p> <p>The Construction and Operations Contractors will ensure that the following are prepared prior to employment of workers:</p> <ul style="list-style-type: none"> • Employment agreements and recruitment policies to include detail on wages, benefits and approach to overtime; • Equal opportunities and non-discrimination policies (incorporating maternity policies and policies associated with gender-based violence and harassment (GBVH)); • Child and forced labour policies / procedures (covering recruitment fees and arrangements as well as document e.g., passport retention); • Accommodation policy to ensure all worker accommodation is compliant with IFC PS2 and the EBRD and IDC Workers Accommodation: Processes and Standards • COVID-19 policy detailing how risks relating to COVID-19 (or similar) will be managed and reported, this will be regularly reviewed based on the latest information and guidance from KSA Government and the WHO.

21 MONITORING, AUDITING AND INSPECTION

The following sections outline the programme for routine monitoring, auditing and inspection to evaluate the environmental and social performance of the Project through its lifetime to ensure compliance with and conformance to the applicable KSA regulations / standards and requirements of the Project Lenders. Periodic monitoring is required during both construction and operation of the Project to not only meet the commitments of the ESIA and associated Environmental and Social Management Plans and conditions of the Environmental Permit but also to monitor and respond to any unanticipated environmental and social impacts and risks that may arise.

21.1 Monitoring Requirements of the Environmental and Social Impact Assessment

As outlined above, a Project specific Environmental and Social Monitoring Plan will be developed for the construction and operation of the Project. The Environmental and Social Monitoring Plan will include the recommended monitoring measures outlined in Volume 2 of the ESIA and will be supplemented by additional detail, including the following:

- The parameters that need to be monitored and measured and the location of monitoring;
- The methodology for monitoring, analysis and evaluation of the monitoring results;
- The compliance criteria against which the monitoring results should be compared; and
- The frequency and duration of the monitoring.

The Project monitoring should ensure the following:

- The timing of monitoring is coordinated with the need for analysis and evaluation of results;
- The monitoring results are reliable, reproducible, and traceable; and
- The analysis and evaluation of the monitoring results is reliable and enables the reporting of trends.

21.1.1 Monitoring Results

The monitoring results should be compared against relevant standards, permit requirements, required thresholds, received complaints, audit findings and requirements of the CESMP and OESMP. The Environmental Manager (or equivalent) from the respective construction and operation Contractor will need to define the appropriate action to follow in the instance that any exceedances in monitoring limits are confirmed or adverse impacts identified. This will include the following:

- Communication protocol in the event that an exceedance is identified;
- Internal review process of recently performance maintenance and inspection;
- Review of previous monitoring results to identify any potential variation or trends in the data;
- Recommendations for quarantine of equipment or change in work practices; and
- Review of monitoring frequency to ensure the issue does not re-occur.

The repetition of measurements is an essential part of monitoring as it detects changes over time and should alert the Contractor to potentially positive or negative impacts of an activity. Adverse impacts should trigger a review of the recommended mitigation measures and determination of the likely source of the impact. This will determine whether additional measures are required or whether a review of the activity is required to identify alternatives. Should no impacts be detected, this may demonstrate a lack of impact, success of the mitigation measures or the requirement to continue monitoring over a longer period of time.

21.2 Auditing Programme

Auditing is an integral requirement of any management system and should be considered as a continual process to ensure successful implementation of the ESMS.

21.2.1 Internal Audits

The ESMS will need to establish, implement, and maintain an internal audit programme to ensure that the ESMS is being properly implemented and maintained. The audit programme will need to identify the frequency, methods, responsibilities, planning requirements and reporting of audits and inspections. Internal audits will be undertaken to assess the compliance and conformance of the Project Proponent and the construction and operation Contractor(s) with the CESMP and OESMP. Internal audits will involve the observation of construction / operation activities, meetings with key Project staff and a review of records i.e., monitoring reports, management meetings, complaints etc.

In the development an audit and inspection programme, the frequency and significance of potential environmental and social risks and impacts should be considered relative to the construction and operational phase and adjust the scope and frequency of the audit accordingly. The Project Proponent (QIC) will develop an auditing schedule for the Project.

When developing and undertaking audits, the following will need to be established:

- A defined scope, criteria, and objectives of each audit;
- The selection of audit staff competent in the audit process and subject matter; and
- Commitment to ensuring audit results are reported to senior management.

During the construction phase, the frequency of audits will be undertaken on a level commensurate to the risks and impacts for the Project. The frequency will be subject to continual review based on the identified level of compliance and anticipated risks associated with specific construction methods and activities.

During the operational phase, audits will be conducted bi-annual as a minimum (dependent on the risks associated with specific operations activities). The audit criteria may vary depending on any external certification that may be linked to the ESMS.

All internal audits will be documented in an Audit Report which will be structured to ensure the progress and compliance of the various ESMS can be reviewed and checked. A summary of the key findings of the ESMS Audit Report will be provided to the Project Lenders.

21.2.2 External Audits

As the Project is seeking finance from Project Lenders who are signatories to EP4 and IFC Performance Standards, independent audits of the Project will be required. External audits may be undertaken by (but not limited to) the following organisations:

- **QIC Audits:** As the Project Proponent, it is expected that the relevant team from QIC will conduct their own audit of the Project's ESMS. The frequency of this audit is not confirmed but it expected to be on an annual basis as a minimum.
- **Project Lender Audits:** These may be undertaken by their representative i.e., Lenders Technical Advisor. The auditing and monitoring requirements will be established by the Project Lenders. The associated reports will be provided to the Project Lenders for review. These reports will be based on site visits to evaluate the implementation of the both the ESAP (a covenant to the loan) and the

suitability and effectiveness of the established ESMS. It is anticipated that these external audits would be conducted every six months during construction and annually during operation.

21.3 Inspections

During construction, daily inspection of the Project site will be conducted by the construction Contractor's Environmental Manager (or equivalent) to monitor and record the general environmental and social performance of the Project. The daily walkover inspection will include key areas i.e., location of construction activities, site offices, site compound / laydown / storage areas and will cover the following as a minimum:

- General site housekeeping;
- Dust management and air quality;
- Ecological observations;
- Noise and vibration disturbances;
- Waste storage and management;
- Lighting management; and
- Traffic management.

All site inspections will be documented via an Environmental Inspection Report which will be submitted to the HSE Manager (or equivalent) on a monthly basis.

21.4 Non-Conformity and Corrective Actions

All non-conformances identified during monitoring, audits and inspections should be recorded and followed up on as a non-conformity. Non-conformances are instances where the compliance obligations of the Project i.e., legal and/or ESMS requirements are not being fulfilled or cannot be evidenced. This also includes near misses that could lead to a major incident. Examples of non-conformity include (but are not limited to) the following:

- Exceedance of an environmental standard;
- Commencement of works without an approved risk assessment and/or method statement that covers the associated environmental and social risks and impacts;
- Appointment of waste transfer/transport/disposal service provides that is not appropriate licensed;
- Failure to comply with the required waste storage/disposal requirements as identified by CESMP/OESMP and/or approved method statement;
- Failure to comply with the required chemical storage and/or handling procedures as identified by CESMP/OESMP and/or approved method statement;
- Un-contained or uncontrolled spills of fuels and/or chemicals;
- Discharge of untreated, contaminate wastewater to the environment

All non-conformances and near misses will be recorded and reported to the Construction Manager (or equivalent). The following information will be outlined in the Non-Conformance Report:

- Location and description of the non-conformance;
- Identification of the root cause of the non-conformance
- Identification and description of the proposed corrective action and the required resources for ensuring the action is implemented;
- The proposed preventative action(s) to avoid re-occurrence of the non-compliance;
- Follow up and monitoring (if required);
- KPIs and a deadline for the successful completion of the correction and preventative action.

22 EMERGENCY PREPAREDNESS AND RESPONSE

The likelihood of an incident can be minimized throughout effective preparedness and response planning of reasonably foreseeable emergency situations as part of an ESMS.

All risk assessments and Method Statements will include consideration of the potential for environmental incidents. Suitable incident response equipment (i.e., spill kits and absorbent material for spills/leaks), should be maintained at appropriate locations on site and Project staff be suitably trained to use such equipment and respond to such emergencies.

The Project will prepare and implement an Emergency Preparedness and Response Plan to include requirements for co-ordination with the applicable external agencies (i.e., emergency services), impacted stakeholders and statutory authorities in the instance that a pollution incident occurs. The plan will identify procedures for reasonably foreseeable emergency situations considering the following:

- The most appropriate method for responding to an emergency situation, including unplanned events, such as fires, explosions and earthquakes, where considered relevant and necessary.
- Internal and external communication process (with stakeholders and responders).
- Action required to prevent or mitigate health and safety, community, and environmental impacts.
- Mitigation and response actions to be taken for different types of emergency situations.
- The need for post-emergency evaluation to determine and implement corrective and preventative actions.
- Periodic testing/drills related to planned emergency response actions.
- Training of emergency response.
- A list of key personnel and aid agencies, including contact details (such as fire department, spillage clean-up services).
- Evacuations routes and assembly points.
- The possibility of the need for mutual assistance from neighbouring organisations / developments / projects.

23 ORGANISATIONAL CAPACITY AND COMPETENCY

The ESMS will require competent personnel to ensure it is effectively implemented. During construction and operation of the Project, QIC, in collaboration with the construction and operation Contractor and their respective sub-contractors, will establish and maintain an organisational structure that defines roles, responsibilities and authority to implement the ESMS and the mitigation and monitoring measures as set out in the CESMP and OESMP. Key ESMS responsibilities are defined and will be communicated to the relevant personnel and to the rest of QIC, as well as the construction Contractor and sub-contractors. Sufficient management sponsorship as well as human and financial resources will be provided to achieve effective and continuous ESMS performance.

23.1 Roles and Responsibilities

The following sections outlines the recommended roles and role description to facilitate the implementation of the ESMS. These roles and assigned responsibilities will be confirmed prior to construction and operation of the Project.

23.1.1 Project Proponent

As the Project Proponent, QIC will confirm and finalise the CESMP/OESMP and notify the appointed construction Contractor of their requirement to ensure all commitments are implemented. QIC will review and monitor the construction / operation Contractor's performance in accordance with the relevant plans (CESMP / OESMP and associated plans and Environmental and Social Monitoring Plan) to ensure alignment with the overarching ESMS.

QIC will engage an external third party to monitor and audit the environmental and social performance of the Project and report their findings back to the Project Lenders. This is anticipated to be undertaken every six months during construction and annually during operation.

It is recommended that QIC identifies a resource who will have overall accountability for environmental and social management and performance of the Project. This is required at the Project Proponent levels as QIC will be the ultimate holder of the Environmental Permit and be accountable for the Project.

23.1.2 Construction / Operation Contractor

It is anticipated that QIC will contractually delineate responsibility of the environmental and social management and performance to the appointed construction / operation Contractor for the respective Project development phase. It is therefore expected that the respective Contractor will specify and assign certain roles and responsibilities for ESMS implementation to specific Project staff. Table 23-1 outlines suggested roles and role descriptions for the implementation of the ESMS. These roles and assigned responsibilities will be confirmed prior to construction and operation of the Project and detailed in the CESMP / OESMP.

Table 23-1 Key Project Roles and Responsibilities

Role	Responsibilities
QIC Project Manager	<ul style="list-style-type: none"> • Review and approve strategic Project HSSE Policy and objectives. • Approve the Project ESMS and procedures. • Define roles, responsibilities for ensuring that environmental and social requirements are implemented and maintained in all areas of Project activities. • Ensure sufficient financial and human resources are available to support the implementation of the Project ESMS. • Monitor overall performance of the construction / operation activities. • Formal sign off and approval of all ESMS documentation. • Overall responsibility to ensure the following: <ul style="list-style-type: none"> ○ Compliance with Contract and QIC Standards ○ Compliance with QIC safety and environmental standards ○ Compliance with all relevant regulations
QIC HSE Manager	<ul style="list-style-type: none"> • Follow up, review and internal approval off ESMS documentation • Inspect and audit construction / operation Contractor; • Assist in liaison with regulators and/or other authorities on environmental and social matters. • Assist with communications regarding environmental and social reporting and any third-party audits (e.g. periodic monitoring as required by the Projects Lenders).
Construction / Operation Contractor Project Director	<ul style="list-style-type: none"> • Review and approve environmental and social management budgets, resourcing and staffing. • Work alongside QIC Project Manager to approve Project ESMS and procedures. Ensure sufficient financial and human resources are available to support the implementation of the Project ESMS; • Monitor overall performance of the construction / operation activities;
Construction / Operation Contractor HSE Manager	<ul style="list-style-type: none"> • Review and approve Contractor environmental and social management budgets, resourcing and staffing • Ensure sufficient resources for the management of environmental and social matters. • Undertake regular site inspections with the Environment Manager. • Monitor and report on environmental management and performance, including compliance with the CESMP/OESMP. • Undertake regular inspections and audits to assess compliance and manage implementation of corrective and preventative actions.
Construction / Operation Contractor Environment Manager	<ul style="list-style-type: none"> • Primary Project contact to implement the ESMS and report to management on the Project's environmental and social performance. • Oversee and ensure execution of the environmental and social management plans and procedures by all Project parties; • Monitor and report on environmental and social management and performance, including compliance with the CESMP and OESMP and all associated management plans. • Monitor the workplace to ensure environmental and social compliance (including for sub-contractors and suppliers- as per the scope of the ESMS); • Liaise with regulators and/or other authorities on environmental & social matters; • Advise management on matters pertaining to the environmental and/or social elements; • Investigate environmental and social issues, incidents and non-conformances, implement corrective actions and report those to the management/relevant authorities; • Maintain applicable environmental and social records as required by the ESMS (e.g. incident registers, non-conformance reports, corrective action reports, grievance register etc.);

Role	Responsibilities
	<ul style="list-style-type: none"> • Ensure monitoring programmes are implemented by qualified personnel and report the results to the Project management for review and as a basis for continuous improvement; • Be responsible for communications regarding environmental and social reporting and any third-party audits (e.g. periodic monitoring as required by the Projects Lenders); • Display and monitor site bulletin boards to ensure they remain 'live' and 'up-to-date' with relevant environmental & social information; • Coordinate, plan, formulate and/or deliver environmental and social induction training to all project personnel (including subcontractors) as well as regular toolbox talk environmental training sessions;
<p>Community Liaison Officer (CLO) Grievance Officer</p>	<ul style="list-style-type: none"> • Refer to Appendix L, Volume 4 • Implements, reviews regularly and improves the stakeholder engagement approaches • Determines necessary resources for effective implementation of engagement and submits to line managers • Evaluates the compliance of Project activities with national and international legislation requirements • Searches the causes of the social incidents that cause; injuries, delays or stoppage in the work and disputes among Project and communities • Monitors grievances and ensure that complaints are resolved and closed within agreed timeframes, Coordinates with parties for proper implementation of the stakeholder engagement commitments.

23.2 Environmental and Social Awareness and Training

All Project staff must be fully competent to perform their tasks based on appropriate education, training or experience. To minimise the environmental and social risks and impacts of the Project, all Project staff should be adequately trained to understand and comply with the environmental and social requirements and commitments of the Project.

Tailored training requirements relevant to the specific areas of works will need to be developed and defined as part of the ESMS (i.e., site personnel associated with waste management will require training on the waste management plan). For a training programme to be successful, it is important to ensure the following:

- Selection of a competent trainer with the appropriate knowledge, skills, and experience to conduct the training;
- Make the training specific to the audience;
- Ensure training is engaging and relevant; and
- Follow up and refresh training to keep abreast of changes in site conditions / activities.

23.2.1 Site Induction

The construction and operation Contractor must ensure that all Project staff and sub-contractors are provided with a site induction and regular training, conducted as frequently as necessary to achieve a level of awareness and competence appropriate to their assigned tasks before they commence their tasks.

All Project staff and sub-contractors must be made aware of the Project's regulatory requirements and must be inducted into the requirements of the CESMP and OESMP. This is typically delivered as part of the site induction prior to any Project staff entering Project site. The aim of the site induction is to raise awareness of environmental and social issues identified in the ESIA and the associated mitigation

and management measures detailed within the CESMP and OESM and to ensure all Project staff are informed of their responsibilities and duties. The CESMP and OESMP should identify the necessary environmental and social requirements to be covered by the site induction. This will include the following as a minimum:

- Environmental emergency response procedures (e.g., in the event of an explosion or fire; procedures to undertake in the case of oil or chemical spills);
- Key Occupational Health & Safety training and information regarding internal incident and emergency response processes;
- The environmental controls chosen to be implemented by the Contractor;
- Raising awareness for any activities that are known to have the potential to be hazardous to the environment, and how to avoid such hazards;
- Reporting procedures listed in the ESMP (in case of an environmental incident complaint), and appropriate contact telephone numbers;
- Site-specific issues such as site boundaries, location of waste and recycling bins refuelling and vehicle maintenance points, storage of plant and equipment;
- The proximity or sensitivity of nearby residents and communities to the Project
- Cultural awareness training to prevent any conflicts with the local communities
- Internal grievance procedures and allowances for worker welfare;
- Site monitoring plans; and
- The outcomes and penalties of inappropriate environmental behaviour.

23.2.2 Toolbox Talks

Toolbox talks are a useful way of providing on-site training to disseminate good practice and provide regular reminders on induction and training content. It is recommended that toolbox talks are held regularly for site personnel and supervisory staff. Required toolbox talks topics and frequencies should be identified within associated risk assessments, method statements plan or procedures.

As a minimum, the toolbox talks will cover relevant updates on health, safety and environmental topics including waste management and waste segregation procedures; correct storage of fuels, oils and chemicals and spill response procedures etc. Employees will also learn how to minimise all potential environmental and social impacts. Toolbox talk training sessions may be focused on the following subjects:

- Dust control and dust mitigation;
- Air quality emissions and control measures;
- Hazardous materials management, handling and transportation;
- Spill prevention and response for personnel involved in the storage of fuel and other hazardous materials;
- Storage, handling and use of chemicals;
- Ecologically significant fauna and mitigation measures;
- Noise control and mitigation measures;
- Traffic control and mitigation;
- CfP;
- Waste management;
- Emergency incident response; and
- Code of conduct to prevent and respond to Gender Based Violence issues (Sexual Exploitation and Abuse/Sexual harassment).

23.2.3 Training Records

Records of training delivered by internal and external providers shall be maintained by the construction / operation Contractor. These records should include a training register which details the following:

- Description of training;
- Purpose of training;
- Date;
- Location;
- Attendee; and
- Trainer.

24 STAKEHOLDER ENGAGEMENT

Stakeholder engagement is a systematic effort to identify, understand and involve stakeholders and their concerns in the Project's development and decision-making process. The purpose of stakeholder engagement is primarily to provide transparency to the community and to inform them of the Project, the associated construction and operation activities and the associated impacts on them and the environment.

The main objectives for stakeholder engagement are:

- To inform the relevant stakeholders about the Project;
- To capture views and concerns of the relevant stakeholders with regard to the Project;
- To enhance ownership of the Project within the host community;
- To provide a basis for stakeholder participation in impact identification and mitigation.

Stakeholders are defined as any group or individual who can impact or be impacted by the Project. These include key stakeholder representatives (community leaders, elected public representatives and traditional representatives) and vulnerable stakeholder groups (including women). In order to conduct effective engagement with Project stakeholders, an analysis of the type of stakeholders and the most appropriate means of communication is required. The identification of stakeholders requires the consideration of persons or groups who:

- Are directly and/or indirectly affected by the Project, due to environmental, social, or economic changes;
- Have an interest in the Project and Project outcomes; and
- Have potential to influence the Project and Project outcomes.

Stakeholder consultation is not a single conversation but a series of opportunities to create understanding about the Project among those that are likely to be affected or might have an interest in it, and to learn how these stakeholders view the project and its related risks, impacts, opportunities, and mitigation measures. Listening to stakeholder concerns and feedback can be a valuable source of information to help identify environmental and social risks (real and perceived) and improve project management.

The Project has developed a Stakeholder Engagement Plan (SEP) which will be implemented during construction and operation of the Project. The SEP will be a live and dynamic document, reviewed regularly throughout the Project's lifetime. The SEP also includes a grievance mechanism to allow communities and stakeholders to raise their concerns related to the development of the Project.

24.1 Grievance Mechanism

24.1.1 External Grievances

The SEP includes a grievance mechanism to allow affected people (and other interested or concerned parties) to lodge a complaint or express a grievance against the Project, project staff or contractors. The process to be coordinated by a delegated Grievance Officer (Appendix L)

The grievance procedure shall be reviewed and updated (as applicable) to ensure it is scaled to the risks and adverse impacts of the project and include consideration of any affected stakeholders.

It must seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies.

24.1.2 Internal Grievances

It is understood that a separate grievance mechanism will be developed by QIC for the workforce related to working conditions and terms of employment. This will be detailed in QIC's HSSE Management Framework. This grievance mechanism will be made available to all contractors involved on the Project, including workers engaged by third parties.

The procedure includes an appropriate level of management to address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution. The mechanism allows for anonymous complaints to be raised and addressed.

The grievance mechanism will not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

All Project staff will be informed of the grievance procedure during the site induction and the procedure will be made readily available and easily accessible.

25 MANAGEMENT AND REVIEW OF RECORDS

Implementation of the ESMS will generate data which will require appropriate management. Management of records (i.e., data and documents) is a key requirement of an ESMS and can be used to track progress, review effectiveness, and demonstrate compliance.

The ESMS relevant to both the construction and operation of the Project will include (but not be limited to) the collation of the following records:

- Induction and training records;
- Relevant records of competence/qualifications;
- Accident investigation reports;
- Grievance register;
- Audit Reports
- Non-Conformance Reports;
- Near Miss / Incident Reports;
- Inspection Reports;
- Environmental and Social Monitoring Reports and raw data;
- Waste Manifest Forms and Chain of Custodies;
- Environmental and Social Risk Assessments and Method Statements;
- Equipment & Social Inspections/Certifications;
- Independent Audit Reports for Lenders; and
- Emergency events.

25.1 Document Control

Document control will be carried out in accordance with QIC's document control procedure, which is likely to address the following:

- Controlled documents;
- Control document preparation;
- Document reference numbering;
- Review of documents;
- Approval of documents; and
- Document recording and removal.

A document register will be prepared and maintained throughout the Project lifetime to record all relevant ESMS documents and data.

Controlled Documents

A 'controlled document' is a standard document produced by QIC in which the format, content and distribution are controlled. A 'controlled format document' is a document where the format is controlled but not the content once the document has been completed. This refers to pre-printed forms including incident reporting, training records and audit checklists. Upon completion of this type of document, a copy is retained and filed on the document register as a record.

Document Approval and Issue

The issue of controlled documents will be under cover note (memorandum) to all persons identified in the distribution list. A Master Register which records the latest revision number of the issues is retained for all such distributions.

The cover note identifies the reason for the issue and which documents are superseded and to be subsequently removed. Each holder of a controlled document is responsible for updating issues upon receipt of the memorandum and removing obsolete copies.

Document Changes and Updates

All documents are to be reviewed and approved by the Project Manager. The authorization of changes will be denoted by a memorandum which will be added at the front of each controlled document. The cover note identifies changes to controlled documents. In each document making up the ESMS, there is a revision log which shall be used to record the date and revision number of each section which is issued as a revision. It is the responsibility of the manual owner to update the revision log on receipt of new or revised sections. They are also responsibility for notifying affected parties that a new version is in use.

An electronic version of the ESMS should be made available to QIC. This version shall be maintained in a 'read only' mode. Changes to this electronic copy may only be made under the delegated authority from the Project Manager. In all cases, changes to the electronic version should mirror only those changes issued to the controlled documents through memorandums or cover notes. The electronic version will act at the most up-to-date version of the ESMS. All hard copies of the ESMS are considered 'uncontrolled' copies.

25.2 Environmental and Social Management System Review

The ESMS should be regularly reviewed according to change in construction and operation methods and activities and in response to results from monitoring, audits, and inspections. Any changes to ESMS documentation that result from these shall be made in accordance with the proposed document control procedure outlined above.

Review of the ESMS should be conducted at a frequency to ensure the adequacy of the ESMS and to ensure that all potentially significant adverse impacts are identified and that associated control and mitigation measures are appropriate to the Project.

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