

Annex B: Table 1 – Social Management and Mitigation Measures for the Chiren UGS expansion project (all project components)

Impact to be addressed	Management and Mitigation measures	Responsibility	Monitoring	KPI
Construction Phase				
Land acquisition and resettlement	<p>A Land Acquisition and Restoration Management Plan was developed for this Project. This document:</p> <ul style="list-style-type: none"> Documents the process followed to acquire land and present gaps with IFC PS 5; Clarifies the number of affected land owners/ users and households by each Project component area; Identifies corrective actions to be conducted to meet IFC PS5 requirements; and Pays attention to a grievance mechanism for submission of claims related to land acquisition/ compensation matters. <p>Note: Resettlement does not take place.</p>	<p>Project Company</p> <p>Independent evaluators selected</p>	<ul style="list-style-type: none"> Periodical review of progress on implementation of the Plan. 	<ul style="list-style-type: none"> Fair Compensations paid to affected landowners/ users.
Labour management & exploitation	<p>The Project Company follows Bulgarian labour legislation which is fully in line with ILO conventions on child labour and exploitation prohibition as well as with EU acquis in this area. The existing set of labour and HR documentation of the Company includes:</p> <ul style="list-style-type: none"> - Recruitment procedure (HR Management procedure), - Internal Labour Management regulation, - Code of Conduct, - Collective Labour Agreement and - Corporate Social Policy of Bulgartransgaz EAD with commitment to follow national and international best practices, including IFC PS. <p>These will be supplemented with additional policies and plans, to be developed to further mitigate risks associated with poor labour practices and inadequate worker accommodation:</p> <p>As part of this, a Project-specific Human Resources (HR) policy will be developed to be applicable for all contractors and subcontractors. The main objective will be to ensure efficient and fair management of workers in compliance with requirements of Bulgarian labor laws and IFC PS2. It will include policy statements relating to the following topics:</p> <p><i>Working conditions and management of worker relationships:</i></p>	<p>Project Company</p> <p>Contractors</p>	<ul style="list-style-type: none"> Records of disclosure of HR Policy through induction and refresher sessions e.g. Attendance lists. 	<ul style="list-style-type: none"> HR Policy developed. HR Policy disclosed to Project Company and Contractor workforce through induction and refresher sessions.

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	<ul style="list-style-type: none"> Working relationship, working conditions & terms of employment, including working hours, wages, leave and benefits; Workers' organizations, freedom of association and collective bargaining; Non-discrimination & equal opportunity; Retrenchment; Grievance mechanism; Training, development, and promotion of employees; Occupational health & safety; Workers engaged by third parties; and Supply chain. Protecting the workforce. 			
	<p>A labor management plan (LMP) will be developed to be applicable for all contractors and subcontractors, establishing practical steps for how Project workers are to be managed, in accordance with the HR policy commitments. Through the LMP, the Project will aim to:</p> <ul style="list-style-type: none"> Fulfill requirements on worker contracts, working hours and overtime, regular inspections/monitoring and corrective action planning of working conditions and labor rights, and other HR regulations; Base employment decisions on principles of non-discrimination and equal opportunity, in particular fair and equal pay, especially for women carrying out the same work as men; Produce job descriptions and provide written contracts and other information that outline the working conditions and terms of employment, including the full range of benefits; Have worker contracts in place prior to mobilization of the workforce with clear statements on working conditions and terms of employment, including overtime arrangements and the timely payment of wages; Inform workers about the grievance mechanism prior to commencement of work and conduct regular refresher awareness raising of the worker grievance mechanism and toolbox talks on workers' rights; Define the Project's Company's obligation and right to monitor and audit contractors' labor management, as well as define how labor requirements will be included in contractual terms 	<p>Project Company Contractors</p>	<ul style="list-style-type: none"> Weekly labour monitoring to verify adequate terms of employment and working conditions on site; Monthly review of worker grievance log. 	<ul style="list-style-type: none"> Number of worker grievances received; Number of worker grievances resolved in timely manner; Number of worker protests, strikes or incidents recorded; Number and types of labour non-compliances identified through weekly monitoring; Number of labour corrective actions implemented in a timely manner; Number and types of training delivered to workers.

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	<ul style="list-style-type: none"> Conduct regular labor monitoring and report on KPIs, e.g. Number of skilled/unskilled workers recruited per gender and local communities; Timely and accurate wage payments; Signed worker contracts; Hours worked (regular and overtime); Number and type of trainings; Quality of worker areas and canteens; and Details of any worker grievances; Organize a training program and keep training registers; Establish OHS procedures that provide workers with a safe and healthy work environment; Ensure acceptable conditions of work including by observing national statutory requirements related to minimum wages and hours of work, and meet international standards of not employing any persons under the age of 16 for general work and no persons under the age of 18 for work involving hazardous activities; Meet international standards related to paying all wages, including bonuses and premium pay for overtime work, in a timely fashion and in a manner consistent with ILO Convention 95; and Commit to not taking any action to prevent employees from exercising their right of association and their right to organize and bargain collectively. 			
	<p>A Worker Accommodation Improvement Schedule will be developed for the management and monitoring of worker accommodation facilities in line with requirements of the IFC Guidance Note on Worker's Accommodation Processes and Standards for the remainder of the use of Project accommodation facilities. The following standards will be observed through development and implementation of this Schedule:</p> <ul style="list-style-type: none"> Compliance with the applicable legislation and regulations; Living facilities will be kept in good repair, kept clean and be provided with adequate privacy and lighting (natural and artificial) and emergency lighting; Adequate ventilation and/or air conditioning systems; Supplied with adequate and convenient supply of free potable water, meeting the applicable drinking water standards and quality and monitored; Adequately drained to avoid the accumulation of stagnant water. Wastewater, sewage, food waste and any other 	<p>Project Company Contractors</p>	<ul style="list-style-type: none"> Regular monitoring of worker accommodation for adequate living conditions. 	<ul style="list-style-type: none"> Number of corrective actions identified in accommodation monitoring; Number of worker grievances received about accommodation conditions.

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	<p>waste will be disposed of appropriately, in compliance with applicable standards;</p> <ul style="list-style-type: none"> • Pest and vector control as well as disinfection will be carried out in compliance with the applicable legal requirements; • Adequate sanitary and washing facilities, canteen/cooking and storage facilities, and basic healthcare and emergency health response facilities will be provided; and • Rest and recreation facilities will be provided. 			
OHS Incidents	<p>The Project's existing HSE Management Plan identifies the overall HSE objectives and targets, emergency contact details, organizational chart, training schedule and an OHS risk assessment and relevant control measures.</p> <p>Through ongoing implementation of this Plan, the Project Company and Contractors will identify potential hazards and develop responses (including design, testing, choice, substitution, installation, arrangement, organization, use and maintenance of workplaces, working environment and work processes) to eliminate sources of risk or minimize workers' exposure to hazards. Where hazards are inherent to the project activity, or it is otherwise not feasible to completely eliminate the hazard, residual risks shall be managed through appropriate protective measures, such as controlling the hazard at source through protective solutions and by providing adequate PPE at no cost to the worker.</p> <p>Training will be provided to all workers on all relevant aspects of occupational health and safety associated with their daily work, including emergency arrangements. Third parties (visitors and external service providers) will be briefed on the relevant aspects of health and safety and emergency response when accessing the premises. The overall site management system will be designed with adequate capacity for oversight of OHS matters.</p> <p>The Project's existing emergency response plan will be upgraded to be compliant with requirements of the IFC PS as necessary.</p>	<p>Project Company</p> <p>Contractors</p>	<ul style="list-style-type: none"> • Daily site walkovers and weekly inspections of OHS management. • OHS incident and permit registers. • On-site clinic records (if any). 	<ul style="list-style-type: none"> • Number of OHS incidents recorded. • Number of OHS trainings conducted. • Status of required OHS certificates and work permits.
Project-induced in-migration	<p>A community grievance mechanism is developed and disclosed to external stakeholders, to facilitate receipt and monitoring of complaints including regarding adverse impacts of Project-induced in-migration on local communities. This procedure will be detailed within</p>	<p>Project Company</p>	<ul style="list-style-type: none"> • Monthly review of community grievances received concerning Project-induced migration 	<ul style="list-style-type: none"> • Number of community grievances received concerning Project-induced migration

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	the Project's Stakeholder Engagement Plan (SEP) prepared as part of this environmental and social related documents package.			
Social conflict and violence – Worker interactions with community	<p>To mitigate risks of social conflict between local communities and Project workers, the following measures will be applied:</p> <ul style="list-style-type: none"> • A worker code of conduct will be developed with commitments on respecting local population and their norms and cultural heritage sites; de-escalation of conflicts; not engaging in illicit behaviour and crime; zero tolerance to harassment and gender-based violence; prohibition of hunting, fishing and gathering of wild crops, and maintaining a safe and peaceful environment on the Project site and within local communities. This document will be written in plain language in Bulgarian and other languages applicable for the workforce, and signed by each worker to confirm their receipt and acknowledgment. • Refresher training will be provided on this code of conduct to all workers, including those of contractors, particularly at induction and dedicated toolbox talks. • All contractors and subcontractors will be required to have similar codes of conduct, policies and training programmes for their workforces or disseminate the Company's suite of documents to their workforces. 	Project Company Contractors	<ul style="list-style-type: none"> • Review of number of signed worker codes of conduct as part of labour monitoring. • Community grievance log. 	<ul style="list-style-type: none"> • Proportion of workforce that has signed worker code of conduct. • Number of refresher training conducted on code of conduct. • Number of community grievances received concerning worker interactions.
Social conflict and violence – Security personnel	<p>A Security Management Plan will be developed and implemented by the Project Company that is aligned with the applicable national legislation and the IFC's 2017 Good Practice Handbook 'Use of Security Forces: Assessing and Managing Risks and Impacts'. This plan will include but not be limited to:</p> <ul style="list-style-type: none"> • Roles and responsibilities of Project Company, contractors and security provider. • Procedures to undertake due diligence on security firms prior to awarding contracts, to check for past claims related to human rights abuses. • Hiring requirements for guards including criminal background checks. • Use of force policies and specialised training of security staff in conflict resolution. • Monitoring and community grievance resolution procedures. 	Project Company Security Contractor	<ul style="list-style-type: none"> • Security incident log. • Security personnel training register. • Community and worker grievance logs. 	<ul style="list-style-type: none"> • Number of security incidents registered. • Number of worker and community grievances received concerning security personnel. • Number and types of training provided to security personnel.

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	<ul style="list-style-type: none"> Equipment and types and frequency of training to be provided to guards. A Code of Conduct for Security Personnel will also be developed with commitments to respecting human rights, de-escalation of conflict and proportionate use of force only where necessary. 			
Social conflict and violence – Gender-based violence (GBV)	<p>To mitigate risks of GBV, the following measures will be implemented:</p> <ul style="list-style-type: none"> The worker codes of conduct to be developed and disclosed for Project Company and Contractor workers will include sanctions that will be applied if a worker is found to be implicated in perpetrating harassment and/or GBV. Periodic mandatory training on GBV will be delivered to all workers, including contractors and subcontractors, addressing definitions of GBV, roles and responsibilities of all actors, and GBV incident reporting mechanisms and accountability structures. The grievance mechanism processes for workers and external stakeholders will enable confidential and/or anonymous submission of claims. A female employee or other female local person, will be dedicated to collect claims of GBV. 	<p>Project Company</p> <p>Contractors</p>	<ul style="list-style-type: none"> Security incident log. Training register. Community and worker grievance logs. 	<ul style="list-style-type: none"> Number of worker and community grievances received relating to GBV. Number of security incidents reported relating to GBV. Number of training on GBV provided to workforce.
Increase in communicable disease incident rates	<p>To avoid and limit the potential introduction and spread of communicable (including Covid-19) and vector-borne diseases among Project workers and local communities, community health and safety measures will be developed and applied throughout various management plans including those for traffic, security, emergency preparedness and response, and Covid-19.</p> <p>Project staff residing in worker accommodation will be provided with sufficient sanitary and first aid/medical supplies, in line with the IFC Guidance Note on Worker’s Accommodation Processes and Standards. These will be detailed in the Worker Accommodation Improvement Schedule.</p>	<p>Project Company</p> <p>Contractors</p>	<ul style="list-style-type: none"> Regular monitoring of worker accommodation facilities. On-site clinic records on infectious diseases. Worker training register. 	<ul style="list-style-type: none"> Number of cases of communicable disease incidents reported in the workforce, including Covid-19. Number of training sessions held on communicable diseases.
Traffic, transportation and road incidents	<p>Refer to Table 3 subsection “Transport and Logistics” for further details, and see Table 2 subsection “Air Quality” and Table 2 and Table 3 subsection “Noise and Vibrations” for mitigation measures concerning air and noise pollution impacts of Project traffic. The community grievance mechanism will also be used to provide timely identification of any issues related to road safety of local communities.</p>	<p>Project Company</p> <p>Contractors</p>	<p>See Table 2 and Table 3</p> <ul style="list-style-type: none"> Community grievance log 	<p>See Table 2 and Table 3</p> <ul style="list-style-type: none"> Number of community grievances received

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				concerning road safety and Project traffic.
Management of community expectations	Ongoing communication with local communities will be undertaken as part of the stakeholder engagement programme as described in the SEP throughout the construction phase, to provide local stakeholders with clear and transparent information concerning Project benefits	Project Company	<ul style="list-style-type: none"> Community grievance log 	<ul style="list-style-type: none"> Number of community grievances received concerning community investment initiatives.
Economic impacts	<p>The Contractors will aim to utilise local skills from within the Project Aol as much as practical.</p> <p>In coordination with the local authorities, the contractors will communicate to the local community:</p> <ul style="list-style-type: none"> job opportunities to local villages (such as through job announcements at local media and local administration offices); Provisions to facilitate recruitment and upskilling of women and disabled candidates, and initiatives to encourage women and disabled candidates to apply wherever feasible. Skills development of local workers, focusing on identification of skills capacity gaps and on-the-job and technical training to be provided free of charge. <p>The contractors will recruit qualified and experienced expatriate staff to fill positions where experienced local staff are not available to ensure adequate management of environmental and social impacts and implementation of mitigation measures. The contractors will make efforts to improve the skills of local staff and organize special courses. All on-the-job and technical training will be provided free of charge to workers employed by the contractors and subcontractors.</p> <p>Local businesses in the area will be given prior notice at least one month in advance concerning the end of the construction phase and the number of workers who will be present on-site throughout the operational phase, so that they can accordingly prepare their commercial activities and stock for the upcoming reduction in customer numbers.</p>	Contractors	<ul style="list-style-type: none"> Workforce statistics with breakdown of local hires. Training registers. 	<ul style="list-style-type: none"> Number of job postings disclosed to local villages. Number of local community members recruited for Project roles. Number of occupational training provided to local Project personnel.

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Operational Phase				
Land acquisition and resettlement	The easement strip will be continuously monitored throughout the operational phase. If potential, additional land acquisition/compensation needs are identified (i.e. for additional access roads), the land acquisition/compensation and land restoration framework that has been developed will be applied.	Project Company	<ul style="list-style-type: none"> Internal monitoring to be conducted as per monitoring arrangements detailed in the LARMP. 	<ul style="list-style-type: none"> Land acquisition and restoration management plan (LARMP) approved and implemented. Compensations paid as per schedule established in the LARMP.
Labour management & exploitation	The HR and labor management policies and plans will be updated for the operational phase as applicable, with ongoing implementation and monitoring activities taking place throughout to address potential risks associated with worker rights and accommodation.	Project Company	<ul style="list-style-type: none"> Regular labour monitoring to verify adequate terms of employment and working conditions on site. Monthly review of worker grievance log. 	<ul style="list-style-type: none"> Number of worker grievances received. Number of worker grievances resolved in timely manner. Number of worker protests, strikes or incidents recorded. Number and types of labour non-compliances identified through regular monitoring. Number of labour corrective actions implemented in a timely manner. Number of worker grievances received about accommodation conditions.
OHS incidents	The OHS plan for the construction phase will be reviewed and updated to reflect the pertinent hazards and risks in the operational phase. The plan will identify specific mitigation measures to reduce OHS risks associated with the implemented activities.	Project Company	<ul style="list-style-type: none"> Inspections of OHS management. OHS incident and permit registers. 	<ul style="list-style-type: none"> Number of OHS incidents recorded. Number of OHS training conducted. Status of required OHS certificates and work permits.
Social conflict and violence	The Project Company will continue implementing the mitigation measures as identified for the construction stage, to address potential	Project Company	<ul style="list-style-type: none"> Review of number of signed worker codes 	<ul style="list-style-type: none"> Number of refresher training conducted on code of conduct.

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	risks associated with social conflict, interactions with security personnel, and gender-based violence.		<ul style="list-style-type: none"> of conduct as part of labour monitoring. Security incident log. Security personnel training register. Community and worker grievance logs 	<ul style="list-style-type: none"> Number of community grievances received concerning worker interactions. Number of security incidents reported. Number of worker and community grievances received concerning security personnel. Number and types of training provided to security personnel.
Increase in communicable disease incident rates	The Project Company will continue implementing the mitigation measures as identified for the construction stage, to address potential risks associated with communicable disease.	Project Company	<ul style="list-style-type: none"> Regular monitoring of accommodation facilities. On-site clinic records on infectious diseases within the workforce. Worker training register. 	<ul style="list-style-type: none"> Number of cases of communicable disease incidents reported in the workforce Number of training sessions held on communicable diseases.
Traffic, transportation and road incidents	Construction phase mitigation measures will continue to be applied in the operational phase. Refer to Table 2 and Table 3 subsection "Transport and Logistics" for further details.	Project Company Contractors	See Tables 2 and Table 3 <ul style="list-style-type: none"> Community grievance log. 	See Table 2 and Table 3 <ul style="list-style-type: none"> Number of community grievances received concerning road safety and Project traffic.
Management of community expectations	Ongoing communication with local communities will be undertaken as part of the stakeholder engagement programme throughout the operational phase, to provide local stakeholders with clear and transparent information concerning Project benefits and employment opportunities that will be available in this phase.	Project Company	<ul style="list-style-type: none"> Community grievance log. 	<ul style="list-style-type: none"> Number of community grievances received concerning community investment initiatives.
Economic impacts	Project company will communicate to the local community:	Project Company	<ul style="list-style-type: none"> Workforce statistics. Training registers. 	<ul style="list-style-type: none"> Number of job postings disclosed to local villages. Number of local community members recruited.

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	<ul style="list-style-type: none"> • job opportunities to local villages (such as through job announcements at local media and local administration offices); • Provisions to facilitate recruitment and upskilling of women and disabled candidates, and initiatives to encourage women and disabled candidates to apply wherever feasible. • Skills development of local workers, focusing on identification of skills capacity gaps and on-the-job and technical training to be provided free of charge. <p>The Project Company will recruit qualified and experienced expatriate staff to fill positions where experienced local staff are not available to ensure adequate management of environmental and social impacts and implementation of mitigation measures. The Project Company will make efforts to improve the skills of local staff and organize special courses.</p>			<ul style="list-style-type: none"> • Number of occupational training provided to local personnel.