5th Operation Phase E&S Monitoring Report - 584 MW Gas Fired Combined Cycle Power Project in Sonargaon, Narayanganj, Bangladesh – Jan-Dec 20255

Draft Report

PREPARED FOR

Unique Meghnaghat Power LimitedLimited

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CONTENTS

LIST OF TABLES

LIST OF FIGURES

ACRONYMS AND ABBREVIATIONS

Acronyms	Description
AAQ	Ambient Air Quality
AI	Aspect Impact
AIIB	Asian Infrastructure Investment Bank
AoI	Area of Influence
ARIPA	Acquisition and Requisition of Immovable Property Act
BCPA	Bangladesh Crop Protection Association
BECR	Bangladesh Environmental Conservation Rules
BFSCD	Bangladesh Fire Service & Civil Defense
BIWTA	Bangladesh Inland Water Transport Authority
BLA	Bangladesh Labour Act
BLR	Bangladesh Labour Rules
BOD	Biochemical Oxygen Demand
BPDB	Bangladesh Power Development Board
BWA	Bangladesh Water Act
BWR	Bangladesh Water Rule
CAAB	Civil Aviation Authority of Bangladesh
CAR	Corrective Action Request

Acronyms	Description
CCGT	Combined Cycle gas Turbine
CCPP	Combined Cycle Power Plant
CEMS	Continuous Emission Monitoring System
CIA	Cumulative Impact Assessment
CL	Casual Leave
CMB	Common Monitoring Basin
CO2	Carbon di oxide
CoC	Cycle of Concentration
COD	Commercial Operation Date
COVID	Corona Virus Disease
CSR	Corporate Social Responsibility
CW	Cooling Water
DEG	Deutsche Entwicklungs- und Investitionsgesellschaft
DG	Diesel Generator
DIFE	Department of Inspection for Factories and Establishments
DoE	Department of Environment
DWP	Demineralized Water Plant
E&S	Environment & Social
ECA	Environmental Conservation Act
ECA	Ecologically Critical Area
ECC	Environmental Clearance Certificate
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
EL	Earned Leave
EMF	Electric and magnetic Field
EMP	Environmental Management Plan
EPC	Engineering, Procurement and Construction
ERM	Environmental Resources Management
ESDD	Environmental and Social Due Diligence
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environment and Social Management System

Acronyms	Description
ETP	Effluent Treatment Plant
FGD	Flue gas Desulphurization
FGL	Finished Grade Level
FNTP	Full Notice to Proceed
GBV	Gender Based Violence
GE	General Electric
GHG	Green House Gas
GIIP	Good International Industry Practice
GIS	Gas Insulated Switchyard
GLC	Ground Level Concentration
GoB	Government of Bangladesh
GRM	Grievance Response Mechanism
GSA	Gas Supply Agreement
GT	Gas Turbine
GW	Ground Water
H_2S	Hydrogen Sulphide
HAZOP	Hazard and Operability
HDD	Horizontal Directional Drilling
HFL	High Flood Level
HIRA	Hazard identification and Risk Register
HP Steam	High pressure Steam
HR	Human Resource
HRSG	Heat Recovery Steam Generator
HSD	High Speed Diesel
IDCT	Induced draft-cooling tower
IEC	Installation, Erection and Commissioning
IEE	Initial Environmental Examination
IFC	International Finance Corporation
ILO	International Labour organization
Km/Hr	Kilometer/Hour
KPI	Key Performance Indicator
kV	kilovolt

Acronyms	Description
LESA	Lenders' Environmental and Social Advisor
LGED	Local Government Engineering Department
LoI	Letter of Intent
LOTO	Lock Out Tag Out
LP Steam	Low Pressure Steam
LPG	Liquefied petroleum Gas
LRP	Livelihood Restoration Plan
MPEMR	Ministry of Power, Energy and Mineral Resources
MPR	Monthly Progress Report
MSDS	Material Safety Data Sheet
MW	Megawatt
NAAQS	National Ambient Air Quality Standards
NEPC	Northeast No.1 Electric Power Construction Co Ltd
NFPA	National Fire Protection Association
NG	Natural Gas
NOC	No Objection Certificate
NOx	Nitrogen Oxides
OCC	Optimized for Cycling and Constructability
OPEC	OPEC Fund for International Development
P&ID	Piping and Instrumentation Diagram
PAH	Poly Aromatic Hydrocarbons
PAP	Project Affected Person
PCB	Poly Chlorinated Biphenyls
PEL	Permissible Exposure Limit
PGCB	Power Grid Company of Bangladesh
PLF	Plant Load Factor
PPA	Power Purchase Agreement
PPE	Personal Protective Equipment
PS	Performance Standard
PUC	Pollution Under Control
PVC	Poly Vinyl Chloride
PWD	Public Works Department

Acronyms	Description
RAP	Rehabilitation Action Plan
RCC	Reinforced Cement Concrete
RMS	Regulatory Metering Station
RoW	Right of Way
SCB	Standard Chartered Bank
SE	Socio Economic
SEAH	Sexual Exploitation, Abuse and Harassment
SEP	Stakeholder Engagement Plan
SFL	Strategic Finance limited
SO_2	Oxides of Sulphur
SPM	Suspended Particulate Matter
ST	Steam Turbine
UMPL	SFL Unique Nebras Meghnaghat Power PLC
STP	Sewage Treatment Plant
SWAS	Steam and Water Analysis System
TDS	Total Dissolved Solids
TGTDCL	Titas Gas Transmission and Distribution Company Ltd
TL	Transmission Line
TSS	Total Suspended Solids
UHRL	Unique Hotel and Resorts Limited
USP	Unsolicited Proposal
WARPO	Water Resources & Planning Organisation
WHO	World Health Organization
WMP	Waste Management Plan
WTP	Water Treatment Plant

EXECUTIVE SUMMARY

ERM India Pvt. Ltd. (ERM) was commissioned by Deutsche Entwicklungs- und Investitionsgesellschaft ("DEG"), Asian Development Bank (ADB) and Asian Infrastructure Investment Bank (AIIB) (hereinafter collectively referred to as "Lenders") to conduct an independent Environmental and Social Due Diligence (ESDD) for proposed 584 MW gas fired combined power cycle project located in Sonargaon, Narayanganj, Bangladesh ("Project"). A consortium led by Strategic Finance Limited named "Unique Meghnaghat Power PLC" ("UMPL"), is developing this project. The name of the project has been changed from SFL Unique Nebras Meghnaghat Private Limited (SUNMPL) to Unique Meghnaghat Power Limited (UMPL) It is understood that the Lenders have already made an equity investment in the Project and have appointed ERM as the Lenders' E&S Advisor (LESA) to undertake periodic environmental and social (E&S) monitoring and support ongoing compliance oversight during the investment period.

As part of this engagement, ERM has so far conducted initial ESDD in January 2021 followed by five periodic E&S compliance monitoring of the project during construction phase and five periodic E&S compliance monitoring of the project during operation phase. This report present findings/observations of the 5th operation phase virtual EHSS compliance monitoring audit.

CURRENT PROJECT STATUS

The Engineering, Procurement and Construction (EPC) Contract is awarded to M/S General Electric Global Services (GmbH) whereas M/S Tractebel Engineering Pvt. Ltd. has been identified as the owner's engineer. The EPC Contractor has made consortium with NEPC and have commenced site construction activities. As per the current status the Provisional Acceptance Certificate has been issued on 02 November 2024 to GmbH after the final handover. Review of the Monthly Progress Report (MPR) shared by UMPL for December 2025 indicated the following operational progress status as stated below:

- During December 2025, there were no Lost Time Incidents (LTIs), maintaining the total at 712 days without an LTI since COD. The period also recorded zero near-miss incidents and no first-aid cases, reflecting continued adherence to safety protocols.
- A monthly pension was disbursed to 54 vulnerable households, and two group discussions were held, addressing child and elderly care in cold, eve teasing and GBV remained some of the key discussion points. Furthermore, UMPLenhanced local healthcare assessments through two static clinic sessions that provided free medical consultations to community members. In addition, LRP implementing partner SAJIDA foundation has started the endline survey from December 2025 to measure LRP implementation outcomes and effectiveness.
- This month, plant availability was 65.68%. Partial availability (GT @ 410 MW) was considered from 1st to 29th December. In addition, from 30th December 2025 to the end of the contract year (19th January 2026), no availability is counted due to the scheduled outage notified to BPDB for rectification of GT BI findings, TIL implementation, and ST restoration works. However, the outage duration may need to be further changed based on the actual turbine inspection findings and spare parts availability.

- After site verification, BPDB shared the reconciled availability data in December 2025 for the period from June to September 2025. For the second contract year, from 20th January to September 2025, the final reconciled availability was 99.36%.
- The plant's net electrical export energy for the month was 0.00 GWh and the plant capacity factor YTD 24.26%.
- The GT factored fired hours (FFH) for the month were 0.00 hours, and the ST runtime was 0.00 hours. By the end of the month, cumulative factored fired hours (FFH) reached 6351 hours for the GT and 5592.30 hours for the ST.
- The implementation of the APM and OPM-GE digital solution system by GE, as per CSA, is in progress.

E&S MANAGEMENT SYSTEM LINKED OBSERVATIONS

ESMS & ISO Audit: While UMPL has formally issued the Environmental and Social Management System (ESMS) aligned with operational requirements, further strengthening is required to fully consolidate the ESMS as an overarching framework document. Clear linkage between company policies, risk assessments, management plans, procedures, and operational SOPs is still evolving. Additionally, systematic training and awareness on ESMS implementation across operational personnel remain areas requiring further strengthening. The site has received ISO certification from TUV valid till 2028.

ENVIRONMENT-LINKED OBSERVATIONS

Regulatory Permits: The name of the company has been updated on all the permits and licenses. The renewal of the BERC license for independent power production is still awaited despite submission of the renewal application.. Further, formal intimation to WARPO regarding discontinuation of groundwater abstraction and completion of borewell decommissioning remain pending to ensure full compliance with the applicable water abstraction permit conditions.

Waste Management: Although hazardous waste management systems are in place and authorized vendors have been identified for certain waste streams, UMPL is yet to finalize authorized disposal arrangements for biomedical waste and e-waste to ensure full regulatory compliance. However, it is noted that waste generation quantities during the O&M stage are currently minimal and not significant; therefore, the requirement for formalized authorized disposal tie-ups is primarily a forward-looking measure to ensure continued regulatory compliance as operations stabilize and waste volumes increase.

HEALTH & SAFETY LINKED KEY OBSERVATION

Hazardous Chemicals: Aqueous ammonia storage is being managed with secondary containment and updated compatibility controls; however, formal risk assessment for storage and handling of aqueous ammonia is yet to be completed, and improved labeling of chemical containers is required for safe handling.

Occupational Noise Monitoring: The site has completed the installation of noise barrier along the plant periphery. Workplace noise monitoring has been conducted within the plant, with results within IFC occupational exposure limits. However, monitoring coverage does not

fully align with all identified high-noise locations specified in the Occupational Noise Monitoring Procedure, indicating a need for more comprehensive monitoring coverage.

Safety Record Book: Although a Safety Record Book has been developed in line with the Bangladesh Labour Rules, 2015, it was observed that the record is not fully updated and was not prominently displayed at conspicuous locations across the site during the current assessment. Key information required under the Rules, including details of hazardous machinery/chemicals, personal protective equipment requirements, fire drill records, electrical inspection information, safety committee composition and training records, and documented safety measures, was found to be incomplete or not consistently maintained, indicating a compliance gap with statutory safety documentation requirements.

Employee Health Surveillance: Periodic occupational health check-ups for UMPL employees have not yet been comprehensively implemented or documented in line with statutory health surveillance requirements. This indicates a gap in systematic monitoring of employee health risks associated with operational exposures and compliance with occupational health management requirements.

Fire Safety Staffing: As verified during the current monitoring, the site has recruited one EHS Engineer, three firemen-cum-truck drivers, and one dedicated fire truck driver in line with the approved organizational structure. However, review of the duty roster indicates that only one fireman and one fire truck driver are generally available during the general shift, with no adequate alternate arrangements available during morning and night shifts or in case of leave/absence. This indicates a gap in ensuring round-the-clock fire emergency response readiness and adequate shift-wise fire safety staffing at the facility.

SOCIAL LINKED OBSERVATIONS

Overtime and minimum wage rate compliance: Non-conformity with respect to overtime payment rate and revised minimum wage rate for construction workers (published in August 2021), were highlighted in previous audits. UMPL has agreed to ensure payment of differential amount of overtime hours performed and minimum wage payment to eligible workers to ensure compliance requirement. In this regard, a detailed assessment on differential amount for eligible workers is prepared.

Releasing of the differential amount is not being initiated now, in view of potential business interruption related risk that were discussed in detail during ERM's 4th E&S monitoring visit. In ERM's 5th E&S Monitoring visit (Feb 2024), it was apprised that project COD was achieved on 19th January 2024 and calculation of differential amount is completed and it has considered period till January 2024.

Next steps towards payment release includes formation of back wage committee, Bank Account opening for depositing the fund for differential amount and the initiating payment to eligible construction workers. It was also apprised that payment disbursal is likely to be initiated by May/June 2024. But political unrest in Bangladesh has delayed the payments that were originally scheduled to begin in May/June 2024.

In ERM's E&S Monitoring visit in Feb 2025 it was apprised that an inventory of workers, including calculations of arrears has been done, verification of list of eligible workers is completed, and a committee has been formed to oversee the payment of back wages.

Communication to the eligible workers for receiving differential amount and collecting their bank account details is started. The next steps toward initiating the process of disbursement of payment to eligible workers are as follows:

- Opening of a bank account in the name of EPC contractor for fund allocation for disbursement to eligible workers by end of February 2025. The account will be solely for the purpose of back wages payment
- Allocation of the arrear amount for total back wages payment including 10% contingency in the EPC contractor bank account by March 2025
- Initiating payment disbursement to eligible workers from April 2025 in batches based on available bank account details of the eligible workers.
- Maintaining monthly records on status of payment disbursement to eligible workers from April 2025
- Undertake completion audit to assess fulfillment of the entire back wage payment process by March 2026 and accordingly back wage disbursement process will be declared closed.

In 5th monitoring, no significant progress was noted on disbursement of differential amounts to the eligible workers. hence UMPL is advised to speed up the overall process of disbursement by giving focused attention on each step required to facilitate the disbursement process which includes updating databased for clarity on number of actual workers who are due to receive differential amount as well as actual total amount that each identified are expected to get, intimation process to identified workers for seeking requirement documents from them for making the payment etc.

UMPL is also advised to come up with revised clear-cut timeline to complete the disbursement process and put in best possible effort to complete the task within the revised timeline.

LRP Implementation: LRP implementation tasks now stand completed. Sajida foundation – LRP Implementation agency had planned to submit final report and close their contract by February 2026. UMPL will need to undertake a third party LRP implementation completing audit and formally close the program. It is understood that M/s. SSCL is entrusted to undertake this completion audit in their present contract for external monitoring of LRP implementation.

1. INTRODUCTION

1.1 BACKGROUND

ERM India Pvt. Ltd. (ERM) was commissioned by Deutsche Entwicklungs- und Investitionsgesellschaft ("DEG"), and Asian Infrastructure Investment Bank (AIIB) (hereinafter collectively referred to as "Lenders") to conduct an independent Environmental and Social Due Diligence (ESDD) for proposed 584 MW gas fired combined power cycle project located in Sonargaon, Narayanganj, Bangladesh (hereinafter referred to as "Project"). Unique Hotel & Resorts Limited (UHRL) is the major sponsor of the project with 51% shareholding. A consortium led by UHRL named "Unique Meghnaghat Power Limited" (hereinafter referred to as "UMPL" or "Company"), is developing this project. The name of the project has been changed from SFL Unique Nebras Meghnaghat Private Limited (SUNMPL) to Unique Meghnaghat Power Limited (UMPL) It is understood that the Lenders have already made an equity investment in the Project and have appointed ERM as the Lenders' E&S Advisor (LESA) to undertake periodic environmental and social (E&S) monitoring and support ongoing compliance oversight during the investment period.

1.2 OBJECTIVES

As Lenders' environmental and Social Advisor (LESA), ERM's overall role is to to support Lender's investment decision and follow-up approach by independently assessing the Company's operations and activities (existing and planned) against the Assessment Framework (see Section 1.3). ERM is required to identify gaps, describe necessary mitigation and management measures, assist the finalization of the ESIA report in accordance with the lenders' environmental and social safeguard policies and follow-up actions. This will be followed by periodic Environmental and Social (E&S) Monitoring i.e. quarterly during construction phase, quarterly for 1st year of operations and annually during operation for the following 2 years to verify compliance within assessment framework (Refer Section 1.4).

1.3 WORK SCOPE – PERIODIC E&S MONITORING

The E&S Monitoring will be undertaken during both construction and operational phases in order to verify compliance within the assessment framework stipulated, which will include verifying the following:

- adequacy of the Company's E&S monitoring report.
- adequacy of the Company and contractor staffing and expertise to properly execute and monitor the E&S aspects of the operational activities.
- implementation status of the contractually agreed Environmental and Social Action Plan (ESAP) and all related processes and documents, as well as any deviations.
- adequacy of the Environmental and Social Management System.
- the implementation status of the Environmental and Social Management & Monitoring Program (ESMP) under special consideration of CO2 emissions (considering use of gas / HFO).
- general site condition and cleanliness, and work execution.
- any known contractual problems with sub-contractors.

- any changes in the original operational plan and their impact.
- any indications for concerns with regard to the relation with local communities, former landowners (or users) or workers.
- any impacts on livelihoods.
- effectiveness and efficiency of stakeholder engagement and GRM.

1.4 APPLICABLE REFERENCE FRAMEWORK

The E&S Monitoring was carried out against the following the Assessment Framework

- Applicable local, national, international environmental, social (including occupational health and safety) legislation, and guidelines.
- ILO conventions covering core labour standards and the basic terms and conditions of employment.
- DEG Exclusion List.
- AIIBs ESP, ESSs and ES Exclusion List
- IFC Performance Standards (PS) 1–8, January 2012.
- World Bank Group General Environmental, Health and Safety (EHS) Guidelines, April 2007.
- World Bank Group General Environmental, Health and Safety (EHS) Guideline for Thermal Power Plants.
- World Bank Group General Environmental, Health and Safety (EHS) Guideline for Transmission Lines.
- World Bank Group General Environmental, Health and Safety (EHS) Guideline for Gas Distribution System.
- IFC`s Stakeholder Engagement Handbook.
- Good Practice Handbook on Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets; and
- Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence.

1.5 ERM TEAM

A three-member ERM team had conducted the desktop review of the information shared by UMPL for the period Oct-Dec 2024 as part of the 4th E&S monitoring exercise undertaken for the project operation phase. The composition of the ERM team were as follows:

- **Dhritiman Ray (Environment, Health and Safety Specialist & Team Leader):** Dhritiman has more than 25 years of experience in the field of EIA / ESIA Studies, Independent Environment Reviews, Urban Planning, Environmental Permitting and Waste Management. As an EIA Expert he has been involved in conducting Environmental Impact Assessments and in preparation of Environmental Management Plans for a wide range of projects in India and other countries including Bangladesh, Sri Lanka, Myanmar, Maldives, Zambia, etc. He has undertaken these projects in a cross-section of industrial, infrastructure and developmental sectors for government institutions, private sector clients and also for bilateral and multilateral funding agencies and financial institutions. He has

also led and participated in E&S Due Diligences, Audits, Compliance Monitoring for Lenders and Project Developers and is therefore well versed with international/bilateral funding agency procedures and benchmarks that are applicable for large industrial / infrastructure projects. He also has considerable experience in working in Bangladesh especially in energy and power sector projectsand has worked on a number of projects with energy and power sector clients such as Bangladesh Power Development Board (BPDB), Bangladesh Rural Electrification Board (BREB), West Zone Power Distribution Company Limited (WZPDCL), Coal Power Generation Company Bangladesh Limited (CPGCBL), Summit Group, Mitsui, etc.

- **Tufail Khan (Social Specialist):** Tufail Khan is a Senior Consultant with the Impact Assessment & Planning Practice at ERM India Pvt Limited. Over his 14 years of experience, Tufail have worked with SENES Consultants India Pvt (A Canadian Environment Consultancy firm), THDC India Ltd (A Mini Ratna PSU in Hydro power generation projects) and currently with ERM India Pvt Ltd at Gurgaon. Carrying out studies related to Social Impact Assessment and Resettlement & Rehabilitation have been his core functional areas throughout his total experience. Construction projects, Hydro power project, Thermal power projects, Wind power projects, solar power projects, mining projects etc. are the sectors wherein he has been actively involved and worked. Tufail has also long experience of implementing Resettlement & Rehabilitation action plan and working with communities at very grass root level.
- **Debojyoti Kundu (Environment, Health and Safety Consultant):**

  Debojyoti is currently working as a Senior Consultant at ERM's Kolkata office, India, with over eight years of professional experience in Environment, Health & Safety (EHS) auditing and advisory across sectors including aluminium, manufacturing, textiles, pharmaceuticals, agri-business and thermal power. His core expertise lies in conducting EHS compliance audits, environmental and social due diligence, management system assessments and regulatory reviews aligned with international standards and lender requirements. He has led numerous onsite audits across India and Bangladesh, particularly over the last four years, supporting regulatory compliance assessments, ESAP monitoring and EHS management system development for textile, fertilizer, pharmaceutical, healthcare and power sector clients.

  In addition to compliance audits, Debojyoti has been actively involved in evaluating operational risks, identifying compliance gaps, and recommending practical mitigation measures to strengthen workplace safety, environmental performance and governance frameworks. His experience also includes ESMS development for international projects, cross-border audit assignments and supplier assessments aligned with global ESG expectations. He regularly supports international financial institutions and investors such as BII, IFC, DEG, ADB, WBG and Blackstone, providing technical audit insights that help organizations enhance EHS performance, maintain regulatory compliance and drive sustainable operational improvements

1.6 APPROACH – E&S MONITORING

The approach to the E&S Monitoring was broadly divided into the following tasks:

- Kick of Meeting

- Desktop based documentation review.
- Virtual site walkthrough and consultation with UMPL and EPC representatives; stakeholders such as workers and affected communities.
- Reporting

1.6.1 KICK OFF MEETING

The virtual audit began with a kickoff meeting with the E&S management representative of UMPL and NEPC-S O&M team. The kickoff meeting helped in developing understanding on the current status of the Project implementation and developments at the site. The ERM team also explained the purpose of the assignment as well as shared the approach and key activities that were planned in the course of the monitoring.

1.6.2 DESKTOP DOCUMENTATION REVIEW

A virtual Data Room (VDR) was created before commencement of the review wherein UMPL had uploaded the relevant documents, as shared through an information request list. The relevant Project documents pertaining to the EHS, and social compliances identified in the ESAP and ESMMP were reviewed at the site. This was aimed at understanding the ongoing implementation, record maintenance, internal monitoring and reporting and mandatory regulatory compliances required for the project. The list of documents reviewed as part of the E&S monitoring exercise has been furnished under **Appendix B.**

1.6.3 DESKTOP REVIEW & CONSULTATIONS

The ERM team, accompanied by the representatives of the Project team, undertook virtual site visits of the key Project components to assess the status and compliance with respect to EHS and social/labour issues and legal obligations. This was followed by consultations with the project affected communities and worker groups. Key activities undertaken during the course of the E&S monitoring visit are presented in **Table 1.1** below.

TABLE 1.1 SITE VISIT & INTERVIEWS – KEY ACTIVITIES PERFORMED

Time Slot	Discussion Topic	Participants
Corporate Management Meeting ***Date: 28th January (Wednesday)2026***		
10:30 AM- 11:00 AM	**Opening Meeting** Introduction session, Confirmation of IRL 5th Monitoring scope, Current project/operational status and major changes since 4th Monitoring, Review of E&S indicators and performance trends	• UMPL Management Team • ERM EHS & Social Team
11:00 AM to 12:00 PM	**E&S Compliance Management** *Review of E&S permits & License compliance status focused on:* BIWTA Clearance Certificate, Department of Explosives approval for Hydrogen Plant, Acid-Alkali Storage License, BERC License for	• UMPL Compliance Team • ERM-EHS & Social Team

	IPP, TGTDCL license for Gas Supply Pipeline from BERC, Boiler Registration Certificate etc.	
12:00 AM to 1:30 PM	**E&S Management System:** *Verification of operation phase ESMS of UMPL focused on:* Policy, Plans & Procedures, Grievance Mechanism and Stakeholder Engagement	• UMPL EHS Team • ERM EHS & Social Team
1:30 PM – 2:30 PM	**Lunch Break**	
2:30 PM- 3:30 PM	**Environmental Management** *Discussion on resource efficiency and pollution prevention focused on:* Noise Barrier Installation Status, Ambient Noise Monitoring Report, Drinking & Ground Water Test Report, Stack Monitoring Report, CEMS 24 hourly Monitoring Record of Last 3 Months, CEMS Calibration Record, Soil Quality Monitoring as per Dutch Standard, Treated Sewage & Effluent Monitoring Record, GHG Inventory Jan-Dec 2025, CCRA Study implementation details, Hazardous & E-waste Disposal Record, Solid & Biomedical Waste disposal record, ECC copy of bio-medical waste vendor, Photographic evidence of adequate secondary containment & compatibility matrix for Aquas Ammonia Storage.	• UMPL EHS Team • ERM-EHS & Social Team
3:30 PM- 4:30 PM	**Labour & Working Condition** *Discussion on Labour & Working Condition focused on:* E&S performance assessment compliance for the manpower agency- SETCO, Status of Wage Disbursement Plan implementation along with Supporting Evidence, LRP Implementation Status along with evidence, Sample appointment letter of the new recruits	• UMPL Social Team • ERM-Social Team
Virtual site Tour & Meetings with UMPL Team ***Date: 29th January (Thursday) 2026***		
10:30 AM- 12:30 PM	**Virtual Site Walkthrough** *Validation of CAP closures on-ground:* high-risk process and operational areas; air emission sources and monitoring points; water management systems (raw water, STP/ETP, discharge); hazardous waste storage and labeling; chemical and fuel storage compliance; machine safety, electrical safety and LOTO; emergency systems (firefighting, alarms,	• UMPL Site Management • ERM EHS & Social Team

	exits, muster points); worker welfare facilities and accommodation (if required).	
12:30 PM-1:30 PM	**Lunch Break**	
1:30 PM- 3:00 PM	**Occupational Health & Safety** *Discussion regarding occupational health & safety focused on:* Details of Fire Truck Driver & Firemen, Emergency Preparedness & Response Plan, Training records of Emergency Response Team, Illumination Monitoring Report, Annual review and certification electrical wiring of the operational units as per BLR, 2015, Safety Record Book as per BLR 2015, Medical Examination Record of O&M Team: Health Register (Form-26) and Fitness Certificate (Form-26A), Annual inspection and maintenance record of onsite active and passive fire protection system, Training record of ERT team member regarding Automatic Gas Suppression System, Status of O&M Plan submission by TGTDCL.	• UMPL EHS Team • ERM EHS Team
3:00 PM- 3:30 PM	Consolidation of findings & preparation for closing meeting	ERM EHS & Social Team
3:30 PM- 4:00 PM	**Closing Meeting** Discussion regarding pending observations and progress status.	UMPL Management Team ERM EHS & Social Team

1.6.4 REPORTING

Information from various sources and direct observations made by ERM have been collated and compared against the reference framework components along with status of the compliance with respect to project ESAP, ESMMP and legal requirements.

1.7 LIMITATIONS & ASSUMPTIONS

While this assessment has endeavored to provide a comprehensive review against the requirements of the Applicable Standards, however, there remain certain limitations to the assessment that should be considered:

- As earlier discussed, the 5th E&S monitoring has been prepared based on desktop review of limited documentation shared by UMPL, as ERM team was unable to undertake any physical visit and/or consultations due to the current geo-political scenario in Bangladesh which impacted in-country travel and data/information sharing.
- This report is based on a desk-based review of information made available to ERM till date. Note that the findings in this report are subject to change depending upon other information that may come up in future. We cannot guarantee that these activities will necessarily yield complete information.

- The independent review is a high-level assessment of environmental and social risks/issues and should not be construed as a detailed legal compliance review to the conditions stipulated by enforcement agencies in the regulatory approvals and limited to the environmental and social approvals already accorded to the Project and shared with ERM.
- The findings and observations made herein are based on application of professional judgement. The findings should be viewed in the context of the applicable scope and objectives of the study and the limitation on time and resources made available to the consultants for the successful completion of the study. Kindly also note that the scope of work did not include any sampling, analysis of environmental media, collection of primary data, engineering design or development of technical specifications or cost estimates among others.

1.8 USE OF THE REPORT

ERM is not engaged in consulting or reporting for the purpose of advertising, sales promotion, or endorsement of any client interests, including raising investment capital, recommending investment decisions, or other publicity purposes. Client acknowledges that this report has been prepared for their exclusive use and agrees that ERM reports, or correspondence will not be used or reproduced in full or in part for such purposes and may not be used or relied upon in any prospectus or offering circular. Client also agrees that none of its advertising, sales promotion, or other publicity matter containing information obtained from this assessment and report will mention or imply the name of ERM.

Nothing contained in this report shall be construed as a warranty or affirmation by ERM that the site and property described in the report are suitable collateral for any loan or that acquisition of such property by any lender through foreclosure proceedings or otherwise will not expose the lender to potential environmental or social liability.

ERM may grant other financial institutions involved in the financing of the Project ("Other Parties") the right to rely on Services or work product generated by or for ERM pursuant to the Contract (“Work Product”), provided that each Reliant Party is specifically identified by name, any agreed consideration is paid, and that these Other Parties deliver to ERM, a signed copy of ERM’s standard reliance letter. The reliance letter shall govern the Other Parties’ right to rely on the Work Product.

1.9 LAY OUT OF THE REPORT

The draft report is structured as under:

Section 1 (This Section):	Introduction
Section 2:	Project Appreciation and Current Status of the Project
Section 3:	ESAP & ESMMP – Compliance Status
Appendix A:	Photo Documentation
Appendix B:	List of Documents/Information Reviewed

2. PROJECT APPRECIATION & CURRENT PROJECT STATUS

2.1 THE PROJECT

Unique Meghnaghat Power Limited (UMPL), a Joint Venture Company constituted by the consortium consists of Nebras Power Investment Management, Unique Hotel and Resorts Limited (UHL), Strategic Finance Limited (SFL) and GE Capital Global Energy Investment BV, has been incorporated in the year 2018 for development of 600-Megawatt (MW) Gas based Combined Cycle Power Plant (CCPP) project with net output of 588.31 at Doodhghata mauza in Pirojpur union of Sonargaon upazila under Narayanganj district, Bangladesh. The consortium of UHRL, GE and SFL has been selected by Bangladesh Power Development Board (BPDB), Government of Bangladesh (GoB) through Unsolicited Proposal (USP) basis. The LoI (Letter of Intent) was issued by BPDB on 25th June 2018. GE has made a consortium with NEPC for project construction and commissioning activity. Corresponding agreements like Power Purchase Agreement (PPA) with BPDB, Gas Supply Agreement (GSA) with Titas Gas Transmission and Distribution Company Limited (TGTDCL), Implementation Agreement (IA) with Power Division, Ministry of Power, Energy and Mineral Resources (MPEMR), GoB and Power Grid Company of Bangladesh (PGCB) have also been executed. The proposed site is located in 21.07 acres of land to the South-west of the Dhaka-Chittagong Highway and right bank of branch channel of Meghna River. This project is expected to be funded by Asian Infrastructure Investment Bank (AIIB), DEG and OPEC Fund for International Development (OPEC Fund) under financial advisory of Standard Chartered Bank (SCB). Summary of the project is presented below:

TABLE 2.1 PROJECT DETAILS - SNAPSHOT

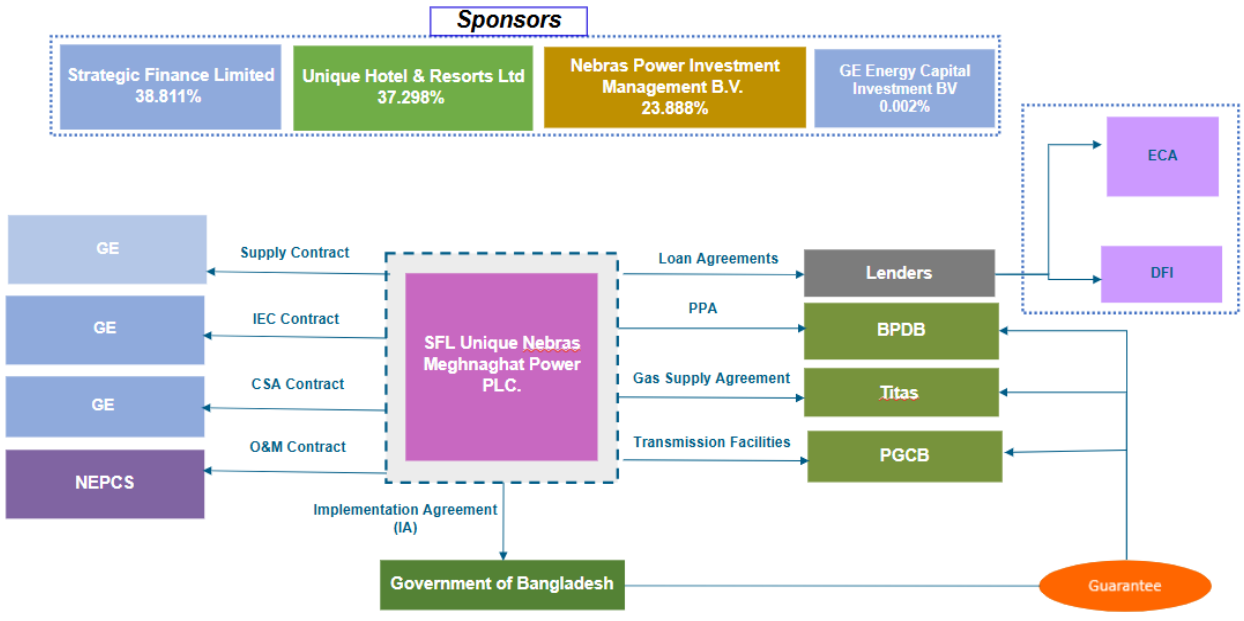
UMPL 584MW Gas Fired Power Project	
Location	Doodhghata Mouza of Pirojpur union, Sonargaon upazila, Narayanganj district, Bangladesh
Project owner	Unique Meghnaghat Power limited (UMPL)
EPC Contractor	General Electric Global Services (GmbH)
Area of Land proposed	21.07 acres
Government Land/Private Land	Private Land from 343 landowners
Plant Load Factor	84.6% with minimum availability of 90%
Electricity Generation	584 MW, however EPC Contractor has guaranteed 588.31 MW
Unit Configuration	Power block of 600 MW with HRSG, one steam turbine and two generators
Fuel Type	Natural Gas (NG)

UMPL 584MW Gas Fired Power Project	
Gas Supply	Titas Gas Transmission and Distribution Company Limited (TGTDCL) through 20-inch diameter subsurface pipeline across the Meghna River
Electricity Off-take	Grid substation of PGCB through 400 kV Single Circuit (S/C) line.
Grid Connection	Nearest Grid Substation of PGCB which is to be located around 800 meters from the project site across the Meghna River near Summit Meghnaghat power project

2.1.1 PROJECT OWNER/COMPANY

Unique Meghnaghat Power Limited (UMPL) would be the proponent of the proposed power plant. UMPL has been duly incorporated under the Laws of People Republic of Bangladesh in the year 2018 as a Limited company to develop, design, finance, build, own, operate and maintain the proposed power plant. UMPL is a multi-venture company of Nebras Power Investment Management (23.88%), Unique Hotel and Resorts Limited (37.29%), Strategic Finance Limited (38.81%) and GE Capital Global Energy Investment BV (0.002%). Project is expected to be funded by AIIB, DEG and OPEC Fund for International Development (OPEC Fund) executed through EPC contractor. Project contractual structure is presented in **Figure 2.1.**

FIGURE 2-1 PROJECT CONTRACTUAL STRUCTURE



Source: UMPL

2.1.2 PROJECT LOCATION

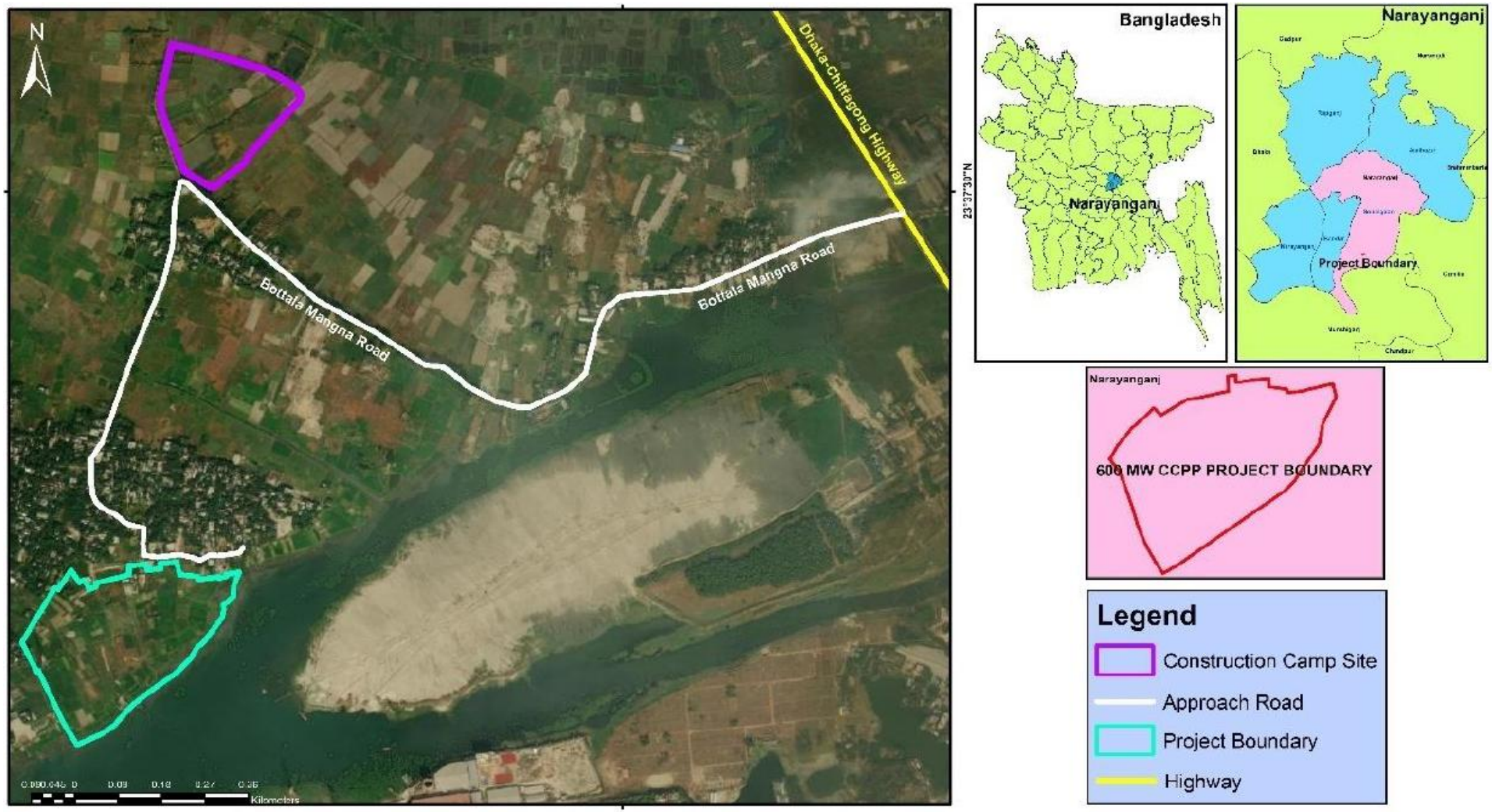
The proposed project site for 584 MW gas fired Combined Cycle Power Plant (CCPP) by UMPL is located in Doodhghata Mouza of Pirojpur union, Sonargaon upazila, Narayanganj district, Bangladesh. The site is about 1.46 km from Dhaka-Chattogram highway to the south-west,

about 3.49 km south-west of the Sonargaon upazila headquarter and about 3.28 km away from Mograpara bus stand by road. The project site is situated on the right bank of the branch channel of Meghna River. The location of the proposed project site lies, geographically between 23°37'4.57"N; 90°35'19.23"E and 23°36'53.20"N; 90°35'34.55"E. The project location on satellite imagery is presented in **Figure 2.2.**

2.1.3 PLANT LAYOUT

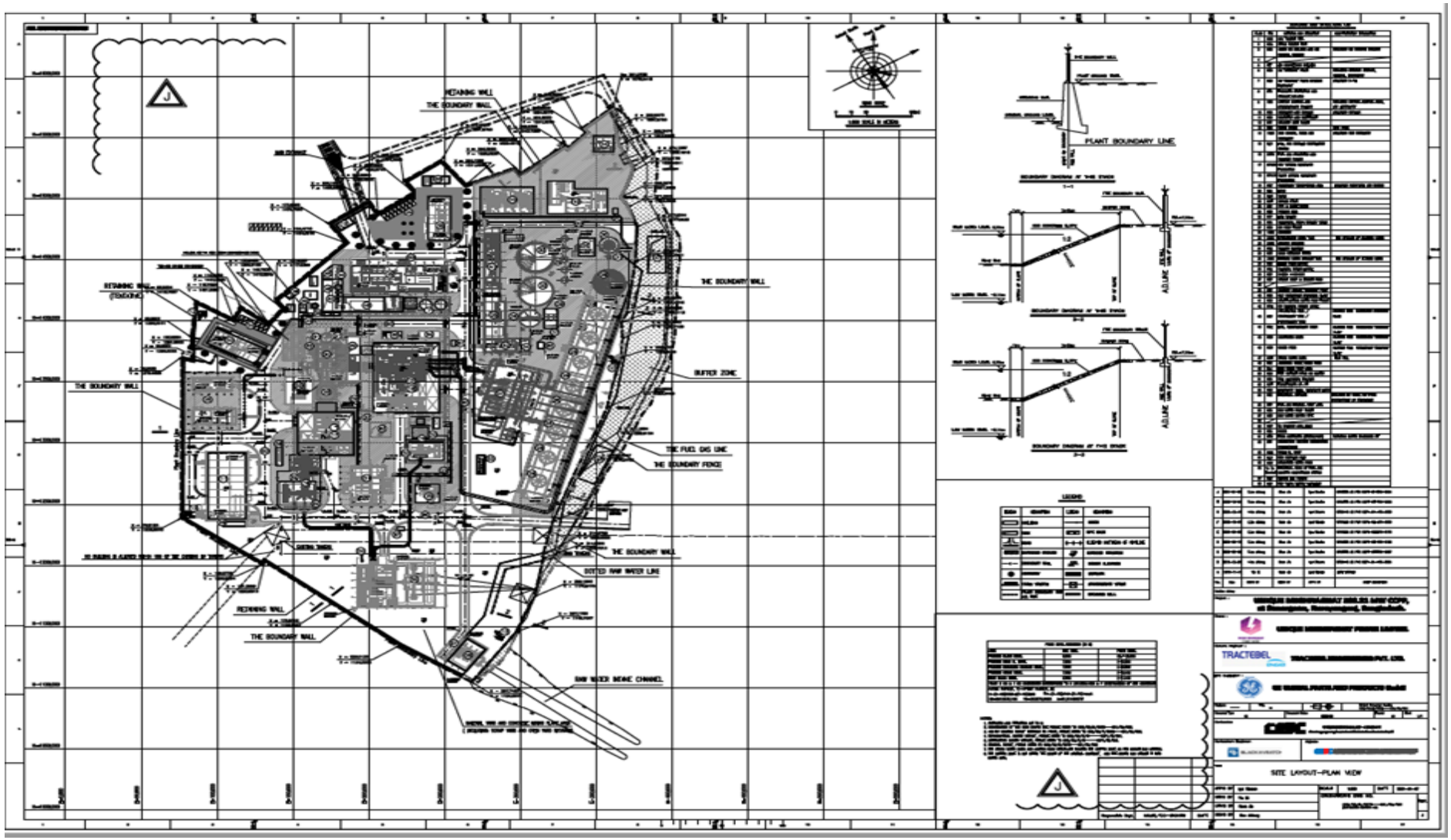
The proposed power plant would be consisting of main block area and auxiliary area. The main block would be comprising of gas turbine hall, HRSG, steam turbine hall, main transformer, and HV unit auxiliary transformer. The auxiliary area will include boiler make-up water treatment plant, industrial wastewater treatment plant, chemical dosing room, mechanical draft counter flow cooling tower, C.W. pump house, mechanical accelerated clarifier, raw water intake pump house, comprehensive water pump house, service & firefighting water basin, raw water basin and potable water basin, filter and sanitary wastewater treatment plant. A site layout map is presented in **Figure 2.3.**

FIGURE 2-2 PROJECT LOCATION – SATELLITE IMAGERY SNAPSHOT



Source: UMPL Project Final ESIA dated 18 Sep 2022

FIGURE 2-3 PROJECT SITE LAYOUT



2.1.4 KEY PROJECT COMPONENTS

ERM has the following understanding of the Project, key project facilities and specific requirements for the project operations:

- Single flow open circuit type gas turbine controlled by Local Control Cubicle and the Central Control Room.
- Heat Recovery Steam Generator (HRSG) at downstream of gas turbine and auxiliaries.
- Steam Turbine Generator plant and auxiliaries.
- Feed water system for delivering feed water from low pressure drum to the HRSG economizer inlet header and supplies spray water of HP steam system, HP bypass system and reheat steam system.
- Condensate system to deliver condensate accumulated into condenser hot well to the LP steam drum of HRSG via the condensate extraction pumps.
- Cooling water system to supply make-up water for demineralized cooling water for gas turbine oil coolers, gas turbine generator hydrogen coolers, steam turbine oil coolers, steam turbine generator air coolers, pumps, steam and water samplers, air compressors, and any other equipment requiring cooling water and to reject the waste heat to the auxiliary cooling water via the closed cooling water coolers.
- Plant Water System to draw water from the Meghna River by 2 X 100% raw water make-up pumps located in the intake water pump house. A closed cooling water system employing Induced draft-cooling tower (IDCT) has been envisaged for each proposed unit to minimize the plant water intake requirement.
- Wastewater Treatment System wherein the wastewater from De-mineralized Water plant and other service area will be treated in the neutralizing pit and effluent treatment plant to the required degree. The total effluent available after treatment from effluent Treatment Plant will be utilized partially for plantation and the balance effluent shall be routed to the outfall.
- A 400kV Gas Insulated Switchyard (GIS) for evacuation of power, import of power for start-up / shut down / station auxiliary power through Unit Transformers.

2.1.5 KEY PROJECT FACILITIES

2.1.5.1 NATURAL GAS SUPPLY

As indicated in the ESIA Report daily requirement of Natural Gas would be approximately 96192 million standard cubic foot (mscf). The gas will be supplied by Titas Gas Transmission and Distribution Company Limited (TGTDCL), which is at distance of 500-700 m across the Meghna Branch Channel. Gas Supply Agreement (GSA) has already been signed between TGTDCL and UMPL. Reportedly and as observed the site has already laid 20inch dia X ~600m pipeline across the Meghna River using horizontal directional drilling (HDD). Leak test of the pipeline has also been completed with pipeline currently under operation.

FIGURE 2-4 GAS PIPELINE FINAL ROUTE MAP

Source: UMPL Project Final ESIA Report dated 18 September 2022

2.1.5.2 TEMPORARY JETTY

Two (02) temporary river jetty have been constructed with the following details:

- One (01) temporary jetty (40m X 20m) has been constructed for unloading construction material, heavy equipment and machinery brought to the site using Meghna waterways. UMPL has obtained permission from Bangladesh Inland Water Transport Authority for use of foreshore waterfront of Meghna River for construction of temporary Jetty, water pipeline & pump house and RCC guide wall.

- In addition to this, Site is constructing another temporary jetty of approximate dimension of 55m X 12m-16m having 600 MT material handling capacity, for unloading of engines.

As observed and reported during the 3rd ESAP visit, UMPL has completed decommissioning the jetties in May 2024.

2.1.5.3 POWER EVACUATION LINE

Power generated from the power plant is getting evacuated to the nearest grid substation of PGCB through 400 kV Single Circuit (S/C) overhead transmission line. 400kV grid sub-station belonging to PGCB will be located around 800 m from the project site. Evacuation of power from the proposed power plant will be done at 400 kV level. The 400-kV single circuit transmission lines between power plant 400 kV substation and PGCB grid sub-station, for this purpose, will be under the scope of this project. Further detailed interconnection plan with PGCB nearest grid substation along with Load flow, short circuit and transient stability with due consideration of capacity addition of proposed 584 MW project will have to be carried out by UMPL in coordination with PGCB.

2.1.5.4 CONSTRUCTION CAMP/LAYDOWN AREA

A total of 12 acres land in Doodhghata mouza was taken on lease for three years from Hamdard Laboratories (WAQF), a Bangladeshi Company for setting up construction camp/laydown area. The land was filled up by UMPL by using river sand up to the road level for constructing temporary construction campsite. As the project has entered operation phase, the construction camp was planned to be decommissioned by August 2024. The construction camp/laydown area was having:

- Office area and living area for UMPL, GE and NEPC.
- Warehouses comprising of shed warehouse as well as Class A & Class B warehouses.
- Material storage in open storage yards.

The site started demolition of worker's camp from 1 October 2024 and finished the activity by 30 November 2024. As per the Camp Handover Document dated 31 December 2024, the temporary land used by Unique Meghnaghat Power Limited (UMPL) for laydown, construction camp, storage, and associated project facilities has been formally vacated and handed back to Hamdard Laboratories (WAQF) Bangladesh Karmochary Kallyan Samity. All equipment, materials, temporary structures, and wastes were removed, and the land was restored to agreed conditions, including levelling to road height, reinstatement/ construction of internal access roads, and rehabilitation of boundary structures. The land was confirmed to be free from encumbrances, debris, or hazards and returned in a safe, stable, and usable condition. Both parties acknowledged that the obligations under the temporary land-use arrangement have been fulfilled, and the handover became effective on 31 December 2024.

2.1.5.5 SEWAGE TREATMENT PLANT (STP) & DISCHARGE PIPELINE

Sewage generated from the site is currently being treated through a modular STP. The STP would consist of Biological Oxidation tank, secondary sedimentation tank, sludge

tank and disinfection tank. The treated effluent is being discharged to a public sewage channel through a 105 m long discharge pipeline.

In addition to the above with project now in operations, an Effluent Treatment Plant (ETP) and STP has been installed and being operated in the main plant area to treat the process wastewater and domestic effluent respectively prior to its discharge into the abutting Meghna River. was supposed to

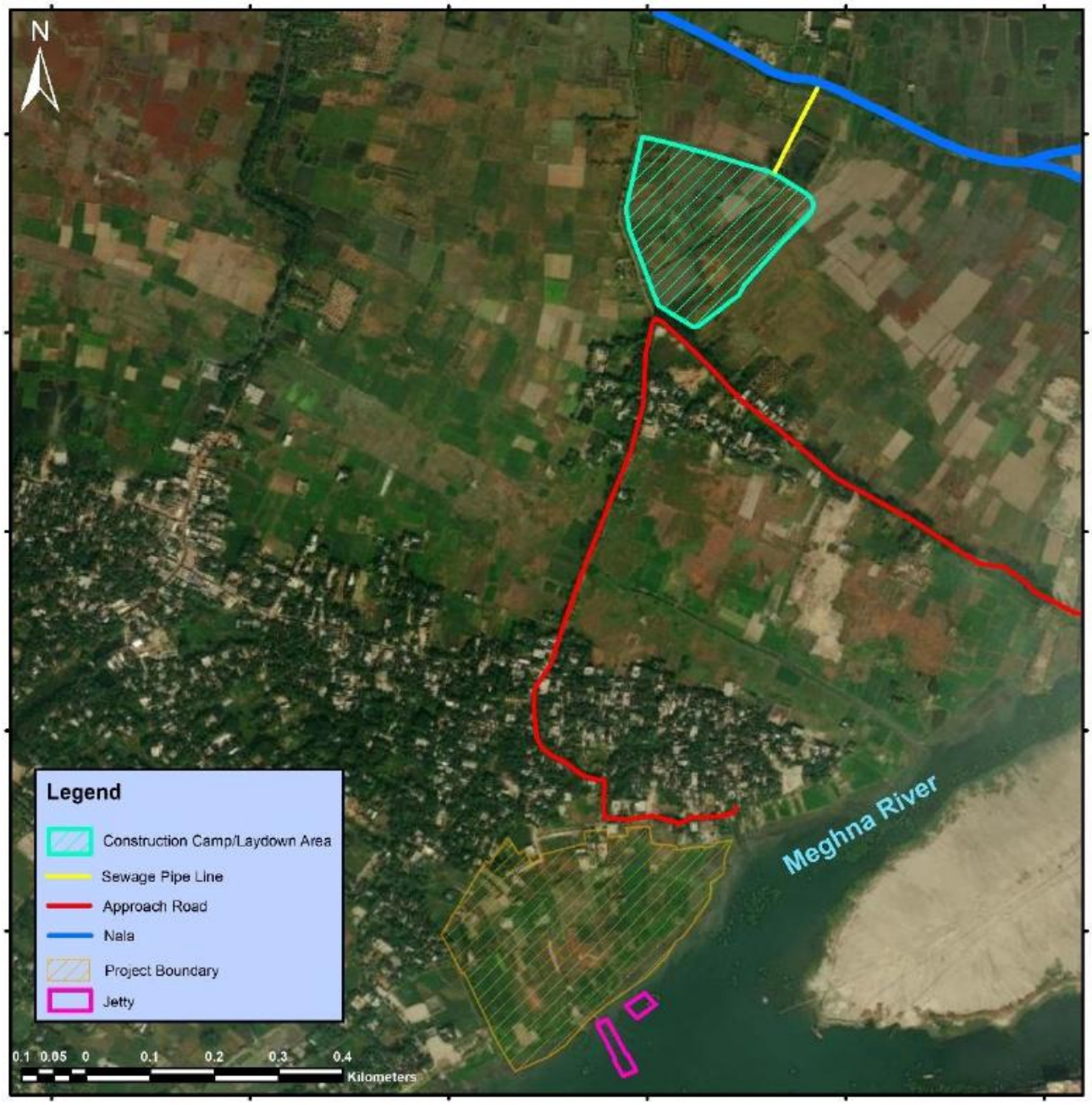
2.1.6 PROJECT ASSOCIATED FACILITIES

2.1.6.1 ACCESS ROAD:

The Project location will be accessed through an earthen branch road coming out from Dhaka-Chittagong Highway. The distance between Highway and project site is approximately 1.5 km. There is no alternate access road available for connecting the site. ERM consider access road widening work as part of associated facility of the project in view of the fact that UMPL requires an access road to connect site location for viability of the project, especially during construction phase for material transportation.

ESIA report mention that 0.1664 acres (0.0673 Hectare) from 27 landowners were procured along the existing village road between Battala Bazar to Plant Gate for widening and strengthening of existing village road that will also be used as access road for the project. As observed during the site visit, the access road is currently being widened by Local Government Engineering Department (LGED) under the Rural and Culvert Maintenance Program.

FIGURE 2-5 LAYOUT OF PROJECT FACILITIES



Source: UMPL Project Final ESIA Report dated 18 September 2022

2.1.7 CURRENT PROJECT STATUS

During the current monitoring period it was observed that the plant was in shut down mode since December 2025 due to maintenance of generators and gas turbines. The plant is scheduled to commence operation from February 2026.

2.1.7.1 EPC CONTRACTOR

The Engineering, Procurement and Construction (EPC) Contract is awarded to M/S General Electric Global Services (GmbH) whereas M/S Tractebel Engineering Pvt. Ltd. has been identified as the owner's engineer. The EPC Contractor has made consortium with

NEPC and have commenced site construction activities. As per the current status the Provisional Acceptance Certificate has been issued on 02 November 2024 to GmbH after the final handover. However, GE will continue to support the operation till 30 June 2025 as per Schedule-3 of settlement deed dated 29 October 2024.

2.1.7.2 O&M CONTRACTOR

- During December 2025, there were no Lost Time Incidents (LTIs), maintaining the total at 712 days without an LTI since COD. The period also recorded zero near-miss incidents and no first-aid cases, reflecting continued adherence to safety protocols.
- A monthly pension was disbursed to 54 vulnerable households, and two group discussions were held, addressing child and elderly care in cold, eve teasing and GBV remained some of the key discussion points. . Furthermore, we enhanced local healthcare assessments through two static clinic sessions that provided free medical consultations to community members. In addition, LRP implementing partner SAJIDA foundation has started the endline survey from December 2025 to measure LRP implementation outcomes and effectiveness.
- This month, plant availability was 65.68%. Partial availability (GT @ 410 MW) was considered from 1st to 29th December. In addition, from 30th December 2025 to the end of the contract year (19th January 2026), no availability is counted due to the scheduled outage notified to BPDB for rectification of GT BI findings, TIL implementation, and ST restoration works. However, the outage duration may need to be further changed based on the actual turbine inspection findings and spare parts availability.
- After site verification, BPDB shared the reconciled availability data in December 2025 for the period from June to September 2025. For the second contract year, from 20th January to September 2025, the final reconciled availability was 99.36%.
- The plant's net electrical export energy for the month was 0.00 GWh and the plant capacity factor YTD 24.26%.
- The GT factored fired hours (FFH) for the month were 0.00 hours, and the ST runtime was 0.00 hours. By the end of the month, cumulative factored fired hours (FFH) reached 6351 hours for the GT and 5592.30 hours for the ST.
- The implementation of the APM and OPM-GE digital solution system by GE, as per CSA, is in progress.

2.1.8 STATUS OF E&S INDICATORS

O&M CONTRACTOR

The status of E&S indicators as obtained from the project O&M Contractor (NEPC) December 2025 is presented in Table below:

TABLE 2.2 O&M CONTRACTOR EHS KPIS DECEMBER 2025

SL #	Indicators	December 2025
1.	No Lost Time Accidents (LTAs) Since last occurrence (days)	712
2.	Reportable LTA (Monthly)	0
3	Reportable LTA YTD	0
4	Reportable Damage to Asset (Monthly)	0
5	Reportable Damage to Asset YTD	0
6	Reportable Environmental Incidents Monthly	0
7	Reportable Environmental Incidents YTD	0
8	EAR (Equivalent Accident Rate) Monthly	0
9	EAR YTD	0
10	EHSS walkdowns performed Monthly	01
11	EHSS walkdowns performed YTD	12
12	Technical walkdowns performed Monthly	01
13	Technical walkdowns performed YTD	12

Source: O&M Contractor Monthly Progress Report – December 2025

In addition to the above, the O&M Contractor (NEPC) has identified the following environmental and social KPIs, with the current status of the said KPIs for the month of December 2025 presented in Table 2.3 below.

TABLE 2.3 O&M CONTRACTOR E&S KPI'S DECEMBER 2025

SL #	Indicators	Unit	Monthly Data for December 2025	YTD (till December 2025)
1.	Number of accidents (air/effluent/spill)	Number	0	0
2.	Total NOx emission	Tons	0	15.71
3.	Total CO2 emission	Tons	12.07	3665.37
4.	Effluent generated	M^3	5126	227453
5.	Water Consumed	M^3	11471	1039333
6.	Water Recycled	M^3	0	0
7.	General waste generated	kg	3800	28730
8.	Waste Disposed	kg	3800	28730
9.	Waste Recycled	kg	0	0
10.	Oil cloth generated	kg	3	37

SL #	Indicators	Unit	Monthly Data for December 2025	YTD (till December 2025)
11.	Used oil filter generated	pcs	166	729
12.	Mud cake generated	kg	2200	15120
13.	Sludge generated	kg	0	0
14.	Used oil generated	litre	1	34.5
15.	Medical waste generated	kg	0	0
16.	Grievance Recorded	Number	0	0
17.	Number of grievances redressed	Number	0	0
18.	Stakeholder Engagement	Number	2	24

Source: O&M Contractor Monthly Progress Report – December 2025

2.1.9 PROJECT MANPOWER REQUIREMENT

Overall manpower size deployed for the project has significantly reduced by end of December 2025 and is presented in **Table 2.4 & 2.**5 below.

TABLE 2.4 MANPOWER INVOLVED AT SITE

SL #	Employer	Manpower size
1.	UMPL Employees	45(14 corporate management staff including 2 female + 9 site management staff + 22 Support)
3	NEPCS employees	78 (03 Chinese + 01 Korian+ 74 Bangladeshi)
4	EPC Employees: • GE Warranty Team • NEPC Warranty Team (Chinese) • NEPC Warranty Team (Bangladeshi)	**25** 4 6 15
	Total	**148**

Manpower break-up of the sub-contractors engaged by NEPC is presented below.

TABLE 2.5 CONTRACTOR MANPOWER BREAK-UP

S. No	Sub-contractors	Scope of work	Manpower size
1	SATCO Services	Main Plant	25
2	King Force (Security)	Main plant	53
3	EKOTA Engineering & Cinstruction	Main Plant	19
	Total		**97**

2.1.10 PROJECT SCHEDULE

The proposed schedule for the project has been presented in the Table below.

TABLE 2.6 PROPOSED PROJECT SCHEDULE VS ACTUAL STATUS

SL #	Project Component	Planned	Actual/Forecast
1.	Signing of EPC Contract between GE and UMPL	30 August 2019	30 August 2019 (A)
2.	Full Notice to Proceed (FNTP)	23 October 2019	23 October 2019 (A)
3.	Clear and Unhindered access to site	23 October 2019	1 December 2019 (A)
4.	GT on Foundation	7 April 2021	22 January 2022 (A)
5.	HRSG OCC Modules (Installation Started)	25 February 2021	4 September 2021 (A)
6.	GT Generator on Foundation	8 April 2021	22 January 2022 (A)
7.	ST Generator on Foundation	19 April 2021	12 March 2022 (A)
8.	Commencement of Cold Commissioning	17 August 2021	20 March 2023 (A)
9.	Completion of Back Energization	23 August 2021	25 June 2023 (A)
10.	Fuel Gas Available	23 October 2021	5 June 2023 (A)
11.	GT First Firing in Simple Cycle	4 December 2021	15 August 2023 (A)
12.	Completion of 1st Synchronization	12 December 2021	21 August 2023 (A)
13.	Completion of Steam Blowing	24 December 2021	25 October 2023 (A)
14.	First Steam to Turbine	13 January 2022	3 November 2023 (A)
15.	Completion of Trial Operation	16 June 2022	19 January 2024 (A)
16	Completion of Performance Test	22 June 2022	26 February 2024 (A)

SL #	Project Component	Planned	Actual/Forecast
17	PAC (Provisional Acceptance Certificate)	22 June 2022	02 November 2024(A)

3. COMPLIANCE STATUS – ESAP, ESMMP, LRP, SEP, GRM IMPLEMENTATION

The compliance status based on the desktop review of the documentation undertaken during Aug 2024 has been presented in **Table 3.1** and relevant sub-sections. To define the status of various action items, colour coding has been used for easy referencing, which is as follows:

3.1 ESAP, ESMMP & REGULATORY COMPLIANCE STATUS

The observations made by the ERM audit team with respect to the project EHS aspects as outlined in the ESAP, EMMP and applicable local and national regulations have been presented in **Table 3.1** below.

TABLE 3.1 ESAP, ESMMP & REGULATORY COMPLIANCE STATUS

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
1.	**EHSS Regulatory Permitting/Compliance**							
1.1	Develop and implement a plan for 100% wastewater recycling for project operations. Update the green belt development plan to ensure 33% coverage of the project area.	S. No 1.1, Table 3.1	UMPL	Copy of wastewater recycling plan	April 2026	Review of the site clearance conditions requires UMPL to develop and implement a plan to facilitate 100% wastewater recycling during operations. However, discussions with the EPC consortium indicate that, as per the current design, both the Effluent Treatment Plant (ETP) and Sewage Treatment Plant (STP) have been installed and are operational with two separate outfalls, and no provision has been incorporated for wastewater recycling. As verified during the current assessment, UMPL has applied for exemption from the 100% water recycling requirement specified under Condition No. 5 of the EIA report, vide letter No. UMPL777-DOE-L-2001 dated 25 March 2024 submitted to the Department of Environment (DoE). In this communication, UMPL has committed to achieving 75% wastewater recycling. While UMPL has outlined a preliminary framework in its Wastewater Management Procedure (Doc. No. NEPCSS-M3-EHS-23, effective from 01 January 2024) and included a table quantifying daily wastewater generation, the plan is not comprehensive. Considering that the proposed two-stage Reverse Osmosis (RO) plant has now been excluded from the project scope, a detailed wastewater recycling plan yet to be developed to achieve a minimum of 75% recycling. The revised plan should clearly present the overall water balance, including freshwater demand, wastewater generation, treated water reuse requirements (such as housekeeping, gardening, dust suppression, and other non-potable uses), and the anticipated discharge to the river. Additionally, separate water balance assessments should be prepared for monsoon and non-monsoon conditions to adequately account for seasonal variations in water demand and wastewater generation. Review of the updated green belt development plan indicates that the current area proposed for green		UMPL to prepare the water recycling plan with proper water balance calculations and considering both non-monsoon and monsoon seasons.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						belt has now been increased from 6.22 acres to 6.95 acres which represents 33% of the total project area. The site has started implementing green belt development plan within the plant constituting 6.41 acres of the total project area. Remaining green belt (0.54 acres) to be developed outside plant i.e., along the project access road and project peripheral boundary. As noted during the site visit, the site has completed tree plantation in 6.95 acres inside as well as outside of plant boundary. The site has planted fruit trees and Conifers near CCB area, Raw water intake, around cooling tower, behind security cabin rear end of GIS area, Warehouse area within the plant premises.		
1.2	Update the BIWTA clearance to cover both stormwater outfall lines as depicted in the project operations drainage layout.	S. No 1.2, Table 3.1	UMPL			BIWTA clearance obtained by UMPL for the stormwater outfall lines, water intake structure foreshore usage, construction of guide wall, gas pipeline and transmission towers has expired on 31 Aug 2024. As per document review, the site has sent a follow-up letter to the Deputy Director of Meghna River port on 29 July 2024 for license renewal and the fees regarding the renewal has been paid on 3 September 2024. During the current monitoring it was observed that the site has obtained renewed license for foreshore use from BIWTA dated 07 January 2026 valid till 31 August 2026.		*Action closed as per the Oct-Dec 2022 E&S monitoring report.*
1.3	Coordinate with WARPO to obtain approval for ground water sourcing from all the onsite bore wells on a fast-track basis.	S. No 1.3, Table 3.1	UMPL	Copy of communication with WARPO	August 2026	Documentation review indicates that UMPL obtained permission from WARPO vide letter dated 11 August 2022 for abstraction of 450 KLD of groundwater to meet construction requirements and 14,000 KLD of surface water from a branch channel of the Meghna River. The permit was initially valid for a period of two years until August 2024. The site subsequently applied for renewal on 09 July 2024 and received the renewed license on 24 August 2024, which is valid for a further period of two years. As per the permit conditions, requirements included installation of monitoring wells and regular		UMPL should formally notify WARPO regarding the discontinuation of groundwater abstraction, complete physical disconnection/decommissioning of all borewells, and obtain written confirmation from the authority to update permit compliance requirements accordingly

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						monitoring of groundwater abstraction quantity and quality. However, during the current assessment, site representatives informed that groundwater extraction is presently not being undertaken and only surface water is being abstracted from the river. It was further noted that formal intimation regarding discontinuation of groundwater abstraction has not yet been provided to WARPO, and physical disconnection/decommissioning of borewells is still pending.		
						Documentation review indicates that UMPL has made communication with WARPO vide letter dated 7 Sep 2023 seeking enhancement in the surface water withdrawal rate to 16300 KLD as compared to 14000 KLD earlier. In consistent with requirements specified in the last E&S monitoring report, UMPL has now prepared and submitted water resource availability and ground water abstraction impact assessment study report along with surface and ground water consumption records for the period Jan-Jun 2023 which is found to vary from 25-30 KLD and 42-44 KLD respectively. In this regard, UMPL has also sought exemption from WARPO in the aforesaid communication regarding the following condition i.e., installation of monitoring well and implementation of rainwater harvesting system, however no confirmation has been received from WARPO till date. Although UMPL has sought exemption/waiver towards implementation of rainwater harvesting the water resource availability study undertaken recommends such system implemented along with sustainable groundwater management practices like artificial recharging etc. Discussion with UMPL representatives indicates that no communication/exemption granted to UMPL on the above matter. The site has prepared a document regarding rainwater harvesting system and sustainable groundwater management (Doc No. NEPCSS-M3-EHS-019 dated 01 January 2024) which includes calculation details related to the volume of surface		*Action item closed during 4th ESAP monitoring.*

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						run-off to be generated from paved surfaces (including roof tops). The plan also includes information related to the design of two stormwater basins identified inside the plant including implementation timeline.		
1.4	Follow up with WARPO seeking status on the clearance/permission on the riverbank protection for the project.	S. No 1.4, Table 3.1	UMPL			Documentation review reveals indicates that UMPL has obtained permission from WARPO vide letter dated 27 Sep 2022 for setting up riverbank protection and temporary Jetty at the branch of Meghna River for the proposed project. The permit is found to be valid for a period of 2 years i.e. Sep 2024. The site has applied for the renewal of same on 15 September 2024 and received the renewed permission on 24th December 2024 which is valid from 27 September 2024 for next two years.		*Action closed as per the Jan-Mar 2023 E&S monitoring report and validated for the current monitoring period.*
1.5	Install indication mark for the pipeline crossing the Meghna River at both sides as per applicable regulatory requirements.	S. No 1.5, Table 3.1	UMPL			In consistent with the Natural Gas Safety Rules, 1991, UMPL has applied for and obtained necessary approval for laying of the natural gas pipeline (20" X 600m) vide Department of Explosives, Bangladesh vide letter dated 30 May 2021. In this regard, UMPL has notified the Chief Inspector of Explosives of the pipeline leak testing with the same being undertaken on 23 April 2022 and relevant test documentation being maintained as per the aforesaid Rules. With project COD declared on Jan 2024 UMPL has obtained approval from the Department of Explosives for the pipeline transmission of natural gas vide letter dated 22 May 2023. As noted during the site walkthrough, UMPL is have noted indication mark of the pipeline passing across the Meghna River at the crossing point of both sides.		*Action closed as per the Oct-Dec 2023 E&S monitoring report.*
1.6	Follow with up Deputy Commissioner office to seek update on the approval status of LPG storage. Post approval, apply for LPG cylinder storage license to the	S. No 1.6, Table 3.1	EPC			As per the temporary facilities demolition plan shared by UMPL indicates that the site is planning to start demolition of worker's camp from 1 October 2024 and finish the activity by 30 November 2024. During the 4th ESAP monitoring it was observed that the site has started the demolition of temporary facility as		*Action item closed during the 4th ESAP monitoring.*

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
	Department of Explosives, Bangladesh					per shared agenda and there is no storage of LPG gas cylinders in the laydown area.		
1.7	Seek approval of layout plan of hydrogen plant under construction from Department of Explosives on a fast-track basis.	S. No 1.7, Table 3.1	UMPL			The project involves the installation and operation of hydrogen plant, with the hydrogen to be used for filling up of high-pressure hydrogen cylinders, which in turn is required for generator initial fill up and regular make-up for generator rotor cooling. Documentation review indicated that UMPL has now obtained license from Department of Explosives for storage of 240 hydrogen cylinders vide letter dated 26 July 2023. The license is found to be valid till 31 Dec 2023. The license is also found to be renewed vide application dated 16 November 2023 and currently valid till 31 December 2024. UMPL submitted application for renewal to Department of Explosives on 03 December 2024 and during the current monitoring it was observed that the renewed license has been issued on 05 January 2026 and valid till 31 December 2026.		*Action item closed during current monitoring.*
1.8	Obtain license from the District Deputy Commissioner for the storage and usage of acid and alkalis as part of the project DWP regeneration system	S. No 1.8, Table 3.1	UMPL			Review of the documentation indicate that UMPL has obtained license for storage of the acids and alkalis in bulk during operations. This includes: • Sulphuric acid: 140 KL • Hydrochloric acid: 140 KL • Caustic soda: 80 KL The license is found to be valid till 30 June 2026.		*Action item closed during 4th ESAP monitoring.*
1.9	Obtain BERC license as an independent power producer (IPP) prior to project operations.	S. No 1.9, Table 3.1	UMPL	Copy of valid IPP license	March 2026	Review of the permitting documentation indicates that UMPL has obtained temporary license from BERC vide letter dated 18 Sep 2023, which is found to be valid for a year (till 8 October 2024) subjected to submission of license fees. Documentation shared indicated that the license fees has been submitted to BERC vide letter 24 Sep 2023. The site has applied for license renewal on 15 September 2024 and yet to receive the renewed copy. As verified during current monitoring, the representatives from BERC has visited the facility on 12 November 2025 and license		Follow-up with BERC for license renewal.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						will be issued post general election in Bangladesh (12 February 2026).		
1.10	Coordinate with TGTDCL to share the BERC license for supply of natural gas and operation of the gas pipeline for the proposed power project prior to operations	S. No 1.10, Table 3.1	UMPL/TGTDCL			With COD declared in January 2024, UMPL communicated to TGDCL vide letter dated 27 October 2024 requesting a copy of the BERC license for the gas supply pipeline. However, despite repeated follow-ups, a copy of the license has not yet been received. As verbally communicated by TGDCL, being a government agency, the document cannot be shared due to confidentiality constraints. The action has been closed based on the confirmation provided by UMPL		*Action item closed during current monitoring.*
1.11	Obtain boiler registration from the Chief Boiler Inspector prior to project operations.	S. No 1.11, Table 3.1	UMPL			UMPL has obtained registration for three water tube boilers from Chief Boiler Inspector vide letter dated 10 Sep 2023. As stated in the aforesaid communication, boiler operation certification shall be issued post installation of safety valve and display of registration number which reportedly shall be undertaken prior to COD. With COD declared in January 2024, UMPL has obtained boiler operation certification which is found to be valid till 23 May 2026. The site has assigned a Class I boiler attendant having valid certificate dated 30 April 2019 for operation, maintenance, and supervision of the boilers as per boiler permit condition.		*Action item closed during 4th ESAP Monitoring.*
1.12	Follow up with manpower supply agency needed to ensure that they obtain the registration certificate soon.	S. No 1.12, Table 3.1	UMPL	Copy of communication with Department of Labour, Bangladesh		For the construction phase, the EPC consortium has deployed one manpower supplier contractor i.e. 'Man is Power'. Registration certificate received from DIFE for this manpower supply agency was valid till 5th Dec 2024 and UMPL was asked to follow up with this contractor for updating their registration certificate. In 9th E&S monitoring visit, it was noted that a new manpower agency (SETCO) has replaced 'Man Is Power' and this agency had valid registration certificate in place.		

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
2.	**PS1: Assessment and Management of Environmental and Social Risks and Impacts**							
2.1	Develop and obtain ISO certification for project operations ESMS.	S. No 2.2, Table 3.1	UMPL	Operation Phase ESMS	April 2026	With the project currently in the operational phase and the O&M team (NEPC-S) being mobilized, UMPL has finalized and formally issued the Environmental and Social Management System (ESMS) to reflect operational stage requirements. While efforts are being made to streamline the ESMS with a focus on O&M activities and align the ESMS Manual with the IFC ESMS Handbook, the system currently lacks full consolidation as an overarching framework document. Clear linkage between existing company policies, risk assessments (including HIRAs), management plans, procedures, and SOPs related to operational activities is still evolving. Additionally, key ESMS components such as stakeholder engagement processes, internal and community grievance mechanisms, emergency preparedness and response arrangements, training and competency frameworks, and monitoring and reporting systems require further strengthening to ensure they are fully operational, practical, and appropriately aligned with the needs of the project's operational phase. Documentation review indicates that SFL Unique Nebras Meghnaghat Power PLC has obtained ISO certifications for both Environmental and Occupational Health & Safety Management Systems from TÜV Austria. The facility is certified to ISO 14001:2015 for Environmental Management System and ISO 45001:2018 for Occupational Health and Safety Management System for the scope of generating and providing uninterrupted electricity from the 584 MW combined cycle power plant. Both certificates were issued on 15 April 2025 and are valid until 14 April 2028, subject to periodic surveillance audits to ensure continued compliance with the respective standards.		• UMPL should further strengthen the finalized ESMS by clearly integrating it as an overarching framework document, ensuring explicit linkage with existing policies, HIRAs, management plans, procedures, and SOPs. • Targeted ESMS training should be conducted for employees and O&M personnel, and key components—including stakeholder engagement, grievance mechanisms, emergency preparedness, competency development, and monitoring/reporting systems—should be operationalized with defined responsibilities, procedures, and implementation timelines.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
2.2	Incorporate EHS&S Policies as part of the agreement / employment contract with the third-party agencies and workers.	S. No 2.3, Table 3.1	UMPL			The site has developed the EHS & Social Policy in local language (in Bengali) signed by the GE Project Director and the same was found to be displayed onsite at conspicuous places like site main entrance, worker camp etc. As noted during the last monitoring, UMPL has integrated the EHSS policies in the sample employee appointment letter being issued. Furthermore, worker agreement (*Manis Power Corporation & Meghna Enterprise*) has also been updated to include the aforesaid policies. With the project currently in the operational phase and the O&M team (NEPC-S) being mobilized, UMPL has developed and formally issued its own Environment, Health, Safety and Social (EHSS) Policy to guide operational activities. The policy, dated 24 April 2025, has been approved by senior management and establishes the company's commitment toward environmental protection, worker health and safety, social responsibility, regulatory compliance, and continual improvement. Following the recent change in the company's name from SUNMPL to UMPL, it has been observed that the updated name has not yet been reflected in the existing policies and associated documentation. The EHSS Policy has been communicated to employees and contractors and is displayed prominently at key locations across the site, including the main entrance and worker accommodation areas, to ensure awareness among the workforces. The policy provisions have also been incorporated into contractor agreements and relevant employment documentation to reinforce compliance expectations for third-party agencies engaged in operational activities.		*The policies are therefore required to be revised and reissued to incorporate the current legal name of the company to ensure consistency, accuracy.*
2.3	Review and update the AI matrix to cover all potential environmental aspects/impacts of the sewage treatment and batching plant operations. The AI matrix mitigation measures also	S. No 2.3, Table 3.1	UMPL and O&M Contractor	Update HIRA Register	March 2026	EPC consortium has prepared an Environment Aspect-Impact (AI) Matrix in line with the EHS Risk Assessment template shared in the EHS Plan. Per the earlier E&S monitoring recommendations, the EPC consortium has updated the AI matrix cover the potential environmental impacts and mitigation		UMPL should update the HIRA to comprehensively cover routine operations, planned and non-routine maintenance, and potential emergency

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
	need to be aligned to the project ESMMP and IFC General/Sectoral EHS Guidelines.					measures for sewage treatment and batching plant operations for construction phase as per the ESAP requirements. Documentation review indicates that UMPL, along with the O&M contractor NEPC-S, has developed a Hazard Identification and Risk Assessment (HIRA) matrix as well as an Aspect-Impact (AI) matrix for operational activities to capture potential environmental impacts. The current AI matrix broadly covers operational areas, and risks have been classified based on impact significance using defined criteria (Probability × Severity + Legal Exposure), with corresponding mitigation measures identified. However, the existing HIRA requires further strengthening to comprehensively capture risks associated with routine operations, scheduled and non-routine maintenance activities, as well as potential accidental or emergency scenarios. The updated HIRAs should clearly present risk significance to facilitate identification of high-risk activities and ensure appropriate control and mitigation measures are defined. Additionally, HIRAs should be developed in a unit/shop floor/department-wise manner to establish clear accountability and support effective implementation of risk controls during the operational phase.		scenarios, with risks clearly ranked by significance. The HIRA should be developed department/unit-wise with defined responsibilities to ensure effective implementation of control and mitigation measures.
2.4	Develop and maintain an updated EHSS regulatory register encompassing applicable regulatory requirements and permit conditions for both construction and operations. Track and record compliance status against regulatory register on a periodic basis	S. No 2.5, Table 3.1	UMPL and O&M Contractor			In line with the ESAP recommendation, UMPL along with EPC Consortium has developed a E&S permit and regulatory register to track compliance with the E&S permit conditions and applicable regulations viz. *Environmental Conservation Rules, 2023, E-Waste Rules 2021, Air Pollution Control Rules, 2022, BIWTA Rules, BNBC 2020, Solid Waste Rules 2021, Water Rules 2018, Noise Control Rules 2006 etc*. The legal register has also been updated to furnish the requirements related to demonstrating compliance with environmental standards prescribed for ground water, treated wastewater, sewage and		*Action Item Closed During 3rd ESAP Monitoring.*

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						ambient noise as per the provision of Bangladesh Environmental Conservation Rules (BECR), 2023 and Noise Pollution Control Rules, 2006.		
						UMPL has developed a consolidated legal register for both construction and operations with the operations phase register now updated to cover the following E&S regulations viz. *Boiler Act, 1923; Petroleum Rules, 2016; and Acid Control Act, 2002, Natural Gas Rules, 1991 and Boiler Attendant Rules, 1953.* The site has also started tracking the regulatory E&S permit conditions for all existing licenses.		*Action item closed during 4th ESAP monitoring.*
2.5	Develop / update and implement the project specific E&S management plans for construction, operations and decommissioning (as applicable) viz. Hydrotest Water Management Plan; Dredged Material Management Plan; Drill Cutting & Drilling Mud Management Plan; Water Management Procedure and Decommissioning Management Plan. Implement Gender Action Plan commitments which includes developing a policy on sexual harassment; constitution of a dedicated committee dealing with sexual harassment issues; organizing awareness session on GBVH with communities and workforce. Implement the Labour Management Plan commitment which includes preparing a Code of Conduct (CoC) for contractor /suppliers which is to form a part of the employment contract and displayed at conspicuous places.	S. No 2.6, Table 3.1	UMPL			As specified in the ESAP and ESMP, the site has presently developed/updated the following management plans as part of the ESIA viz. Hydrotest Water Management Plan; Dredged Material Management Plan; Drill Cutting & Drilling Mud Management Plan; Storm Water Management Plan and Decommissioning Management Plan. As recommended in the last audit, the EPC consortium has development a method statement and a timeline for decommissioning activities to be undertaken at both camp and office including management of waste generated from some activities. The method statement also outlines the potential E&S risks associated with decommissioning activities like height work, material lifting, dust and noise generation etc. along with the mitigation measures/controls to be adopted. UMPL have an approved 'Sexual Harassment Policy' in place which defines the process of reporting and handling the sexual harassment related cases associated with project. Awareness session on GBVH issues with local communities are being conducted by Sajida Foundation (LRP implementation Agency) under the supervision of UMPL CDM (Community Development Manager). CDM is also responsible for conducting GBVH awareness session with construction workers. Sexual harassment committee is formed by Sajida foundation to deal with any GBV		*Action Item Closed during current monitoring*

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
	Update the Labour Management Plan to encompass specific role and responsibilities of key personnel identified for implementation of the Plan including a checklist to assess compliance with the Plan requirements on a periodic basis.					issues if reported by community. As advised in previous audit, this sexual harassment committee has now ensured representation from UMPL as well. As advised in previous audit, UMPL was developed Labour Management Plan document and included COC (code of conduct) that are applicable for all site workers including sub-contractor workers. With project now in operations, NEPC-S – the O&M contractor has developed the following E&S plans/procedures for operations phase: • Permit to Work • Caustic, Acid and Chlorine Handling Procedure • Emergency Response Plan • Electrical Safety Program • First Aid • Spill Prevention and Response Procedure • Waste Management Procedure • Community Development Procedure • Grievance Redressal Mechanism/Procedure • Noise Exposure Evaluation and Hearing Conservation • Compressed Gas Cylinder Management Procedure • Flammable Liquid Handling Procedure • Machine Guarding Procedure • Pest Control Procedure • Stakeholder Engagement Procedure The site has developed following plans/procedures for operation phase as per the ESMP requirements**: Air Quality Management, Wastewater Management Plan, Waste Management, Occupational Health & Safety, Environment Monitoring Plan and Incident Investigation**. The above-mentioned procedures are effective from 01 April 2024. The site has updated the management plans to close all the gaps identified during last four operation phase audits.		
2.6	Ensure mobilization of the remaining EHS Supervisors by NEPC as per the organogram.	S. No 2.7, Table 3.1	UMPL	Copy of appointment letter of	May 2026	In line with the ESAP recommendation, the EPC consortium has deployed a Project EHS Manager (GE), Assistant EHS Manager (GE) and 2 Project EHS		The site must prepare a team of at least three fire truck driver and three

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
	Document and integrate the roles and responsibilities of the UMPL EHS Manager and Assistant Manager – Community Development in the EHS Plan.			Fireman and Fire Truck Driver		Manager (NEPC) and the same has been presented in the EHS organogram along with the EHS Supervisors, Site Doctor & Paramedic, EHS Trainer, Lifting Specialist & Coordinator and Certified Scaffolder. In addition to the above, GE and NEPC has mobilized 7 and 15 EHS Supervisors respectively and the same was found to be depicted in the EHS Organizational chart. Review of the project EHS Plan indicates that the roles and responsibilities of the UMPL EHS Manager and Manager – Community Development has now been documented and integrated in the aforesaid Plan. Review of the operations organogram and consultation with UMPL representative reveals that a total of two (2) managerial level EHS personnel (EHS Head and EHS Engineer) has been mobilized by NEPC-S – the O&M contractor for this project. Reportedly, for managing the E&S risks pertaining to the warranty and transition period, the O&M EPC contractor will be supported by an EHS In charge to be mobilized by the EPC Contractor along with an EHS Supervisor, EHS Manager, an EHS Engineer, two fireman and one fire truck driver. UMPL has defined the roles and responsibilities of the EHS personnel of both NEPC-S and EPC Contractor. As verified during the current monitoring, the site has recruited one EHS Engineer, three firemen-cum-truck drivers, and one fire truck driver in line with the approved organogram. <u>However, review of the duty register indicates that typically only one fireman and one fire truck driver are present at the site during the general shift. No alternate arrangements appear to be in place to ensure fireman and fire truck driver coverage during morning and night shifts or during periods when the assigned personnel are on leave, which may impact emergency preparedness and response capability.</u>		firemen to ensure at least one of them are present in every shift in case of an emergency.
2.7	Update the EPRP to include the site lay out plan, list of fire	S. No 2.8, Table 3.1	UMPL and EPC			The EPC consortium has updated the EPRP to include the list of fire prevention and control equipment,		*Action item closed during current monitoring*

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
	prevention and control equipment, updated onsite responders list along with details of medical and firefighting team.					along with contact details of First Intervention Team, Alarm & Evacuation Team, Emergency Coordinators, Search and Rescue Team, Security Team, Tactical Team and Oil Spill Response Team. Documentation review indicates that an annual mock drill schedule has been prepared for 2024, with mock drills being undertaken on a six-monthly basis and results documented. Records indicated that the site undertook mock drills on 25 April 2024 with records to be shared for review and validation. The site conducted mock drill in the presence of representative from BFSCD on 16 July 2024 where total 57 persons from UMPL participated and record has been maintained in prescribed format (i.e. Form 22A) as per BLR, 2015 requirements. As per BLR 2015, at least 18% workers of every division of the establishment shall be provided with training on fire extinguishing, rescue and first aid and the use of portable fire extinguishing equipment's and from the trained workers fire extinguisher teams, rescue teams and first-aid teams (6% member of every team) shall be formed, and this shall be recorded in accordance with Form- 22. The site has identified 20 persons for fire extinguisher teams, rescue teams and first-aid teams and conducted training from 15- 18 September 2024 in the presence of representative from BFSCD. The record has been maintained in form-22 and signed by Warehouse Inspector of BFSCD. As verified during the current audit, the Emergency Response Plan (ERP) dated 01 January 2024 has been updated to incorporate details of the trained fire extinguisher team, rescue team, and first-aid team. The project has been designed with modern fire detection and suppression systems, most of which have been commissioned on site. To enhance operational preparedness, specialized training on fire detection and suppression systems was provided by an external trainer to 23 Emergency Response Team (ERT) members on 28 May 2025, improving the		

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						team's understanding and readiness to respond effectively to potential fire emergencies.		
2.8	Arrange for a standby boat equipped with life jacket and trained personnel to respond to any project riverine traffic related emergencies.	S. No 2.9, Table 3.1	UMPL and EPC	Photographic evidence		In consistent with the ESAP recommendation, the site has now updated the Emergency Preparedness and Response Plan (EPRP) to encompass emergencies related to road and riverine traffic incidents/accidents along specific response, evacuation and rescue measures. Furthermore, as specified in the EPRP and ESAP, the site has now provided a standby boat equipped with life jacket and trained personnel at the material loading and unloading temporary jetty. The same was found to be made available during the current E&S monitoring visit undertaken.		*Action closed as per the Oct-Dec 2022 E&S monitoring report.*
2.9	Perform quarterly E&S audits of the manpower supply contractors to assess compliance with applicable regulatory requirement and project E&S plans/procedures. Extend the coverage of the weekly EIC to cover the worker accommodation along with the development of CAPA for all non-conformances identified.	S. No 2.11, Table 3.1	UMPL & EPC	Copy of quarterly subcontractor audits Copy of weekly EIC	April 2025	The Project EHS Plan developed by the EPC consortium reveals the requirement for performing quarterly audit/inspection of the subcontractor HSE performance with the audit findings and corrective actions/recommendations to be reported to the subcontractor site manager to facilitate necessary closure. EPC had engaged "*Meghna Enterprises*" and "*Man-Is-Power*" as manpower supply contractors for the construction phase of the project. The EPC consortium undertakes quarterly EHS performance audits of the aforesaid subcontractors with audit reports being maintained. As recommended in the last quarter audit, Corrective & Preventive Action Plan (CAPA) is required to be developed for the non-compliance identified as part of such quarterly EHS audits. The Fourth Quarter Audit of SATCO, the manpower supply contractor, was conducted on 12 January 2026 to assess compliance with labour and occupational health and safety requirements. The audit covered aspects such as worker documentation, PPE provision, safety training, welfare facilities, emergency preparedness, and compliance with labour laws. The assessment indicates that 15 out of 17 applicable checklist items were compliant, with two items marked as not applicable, reflecting overall		Action Item Closed During Current Audit

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						satisfactory compliance with the evaluated parameters.		
2.10	Update and implement the project Environmental Monitoring Plan to cover all environmental attributes and parameters as specified in the regulations and IFC EHS guidelines. The plan to clearly outline the rationale for selection of the monitoring locations.	S. No 2.12, Table 3.1	UMPL and O&M Contractor	Quarterly Environmental Monitoring Report	Continuous	Environmental Monitoring Plan (EMP) outlined in the ESIA report continues to be implemented during the operational phase. The site continues to undertake environmental monitoring through Department of Environment (DoE), Bangladesh–approved agencies in line with Environmental Clearance Certificate (ECC) conditions. The September 2025 environmental monitoring report has been considered as the latest representative operational dataset, while the December 2025 monitoring results have not been considered due to plant shutdown during that period. **Ambient Air Quality Monitoring** Ambient air monitoring was conducted at six locations including plant boundary areas (near main gate and jetty) and nearby sensitive receptors such as Purba Para Mosque, Dudhghata Primary School, Poschim Para Jame Mosque, and Kurbanpur Ghat. Parameters monitored included PM_{10}, $PM_{2.5}$, SO_2, NO_2, and CO in accordance with the Bangladesh Air Pollution Control Rules, 2022 and relevant IFC reference guidelines. Results indicate compliance with Bangladesh regulatory standards; however, particulate matter concentrations at certain locations were relatively higher compared to IFC guideline reference values, likely influenced by regional anthropogenic activities rather than plant operations. **Ambient Noise Quality Monitoring** Ambient noise monitoring was undertaken at six locations covering industrial zones within the plant, silent zones (mosques and school), and mixed-use areas in accordance with the Noise Pollution Control Rules, 2006 (Bangladesh) and IFC/WB noise guideline references. Monitoring results were generally within prescribed Bangladesh standards, with marginal elevation observed at one silent zone		*The Action item closed during current monitoring.* *Quarterly Monitoring to be continued as required.*

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						location attributed mainly to surrounding vehicular and community activities. **Surface Water Quality Monitoring** Surface water sampling was carried out at four locations (upstream and downstream of the Meghna River discharge point). Parameters including pH, DO, BOD, COD, TSS, nutrients, oil & grease, heavy metals, and microbiological indicators were analyzed against Environment Conservation Rules (ECR), 2023 – Schedule 3 (Surface Water Standards). Results were reported within applicable Bangladesh regulatory limits, indicating no significant operational impact on receiving water bodies. **Groundwater Quality Monitoring** Groundwater samples collected from nearby sources around the facility were analyzed for key physicochemical and microbiological parameters as per applicable Bangladesh drinking water standards under ECR 2023 relevant schedules. Results indicate compliance with regulatory standards with no adverse impact from plant operations observed. **Effluent Treatment Plant (ETP) Monitoring** Treated effluent from the ETP outlet was monitored for parameters including pH, BOD, COD, TSS, oil & grease, heavy metals, nutrients, and other specified parameters in accordance with ECR 2023 – Schedule 4 (Industrial Effluent Discharge Standards). Monitoring results indicate compliance with Bangladesh regulatory discharge standards, reflecting satisfactory performance of the effluent treatment system. **Sewage Treatment Plant (STP) Monitoring** Treated sewage effluent from the STP outlet was monitored for parameters such as pH, temperature,		

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						BOD, COD, suspended solids, nutrients, oil & grease, and microbiological indicators as per ECR 2023 – Schedule 3 (Sewage Discharge Standards). All monitored parameters were reported within Bangladesh regulatory limits, indicating effective sewage treatment system performance. **Stormwater Quality Monitoring** Stormwater monitoring was undertaken at the stormwater basin/outfall for parameters including pH, BOD, COD, TSS, nutrients, and selected metals in line with ECR 2023 discharge standards and applicable IFC EHS guideline references. Results indicate compliance with applicable regulatory standards. **Soil Quality Monitoring** Soil quality monitoring was undertaken within the plant boundary for parameters including pH, salinity, electrical conductivity, and selected heavy metals. However, due to the absence of established Bangladesh regulatory standards for soil quality under ECR schedules, compliance assessment could not be formally established, though results serve as baseline environmental data. **CEMS and Stack Monitoring Status** Continuous Emission Monitoring System (CEMS) is installed for operational emission monitoring, and calibration certificate shared during audit confirms satisfactory performance of the system. Real-time emission monitoring is being undertaken as part of routine compliance reporting. Third-party stack emission monitoring has been undertaken by a DoE-approved laboratory during the operational phase. Stack emissions were analyzed for parameters including particulate matter (PM), NOx, SO_2, CO, CO_2, temperature, and oxygen levels using standard monitoring equipment. The monitoring results		

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						indicate compliance with applicable Bangladesh emission standards for gas-based power plants as well as relevant IFC/World Bank reference values, thereby validating the performance of emission control systems and supporting the reliability of the CEMS data.		
2.11	Update the monthly E&S progress report to include social KPIs along with key environmental KPIs such as water consumption, wastewater generated and discharged, waste recycled/disposed	S. No 2.13, Table 3.1	UMPL and O&M Contractor	Copy of monthly EHS KPIs for construction	March 2026	EPC generates a monthly progress report encompassing Environmental and H&S KPIs along with key E&S incidents/issues and corrective actions. The following key EHS KPIs are reported in the progress report viz. *Fatalities, LTIs, Medical Treatment Case, First Aid Case, Fire, Near Misses, Stop Work, Safety Rewards, Training hours, Toolbox Talks, Safe Man hours, EHS Inspections, Spill Incidents, Waste generation etc.* As recommended in the last audit report, environmental and social metrices in the form of water consumption, waste generation and stakeholder meetings etc. has been captured in the EPC monthly progress report of August 2023. The same was reviewed and validated for the current monitoring period. Reportedly, O&M KPIs will be documented and reported by the GE-NEPC consortium till the time performance test is complete post which this will be taken up the O&M team (NEPC-S and UMPL). Review of the monthly progress report of June 2024 (as prepared by the O&M contractor) reveals coverage of EHS KPIs which includes safety KPIs like Loss Time Injury, Damage to Asset, Monthly EHSS walkdowns and number of accidents (air/effluent/spill). Key environmental and social KPIs include: • Total NOx emission (tons) • Total CO2 emission (tons) • Effluent generated (m3) • Water Consumed (m3) • Water Recycled (m3) • Oil cloth generated (kg) • Used oil filter generated (pcs) • Mud cake generated (kg)		Establish a structured system for recording, analysing, and trending leading safety indicators (including first-aid cases and near misses), supported by regular awareness programs to encourage proactive reporting and timely preventive actions across the facility.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						• Sludge generated (kg) • Used oil generated (drums) • Total Waste Disposed • Total Waste Recycled • Medical waste generated (kg) • No of Grievances Reported • No of Grievances Resolved • Stakeholder Engagement Kindly refer Table 2.3 to find the monthly and YTD reported value to the indicators. However, further strengthening is required in the systematic capture, analysis, and trending of safety indicators, particularly first-aid cases, near-miss incidents, and leading safety indicators. Increased emphasis on awareness building and fostering a proactive reporting culture across the facility would support early risk identification, preventive action, and continuous improvement in occupational health and safety performance.		
2.12	Update the SEP to include a point on specific channel of communication for external stakeholders established on regular basis to register concerns /feedback from general public or any other external stakeholder. A clear reporting format should be developed and used for SEP Implementation. Implement the Grievance Redress Mechanism for community and report regularly.	S. No 2.15, Table 3.1	UMPL	External Communication procedure document Stakeholder activities to be reported in the ES monitoring report Functional GRM; records and database of grievances (including all formal and informal complaints and legal court cases) and resolutions: grievances to be reported in the		It was reported in previous ERM's audit report that SEP document has included the specific channel of communication for external stakeholders, and it is being implemented by UMPL management. GRM function appears to be working at satisfactory level. Stakeholder, specifically local community in close vicinity of project are well aware with team responsible for registering their issues and concerns. Records of issues received from stakeholder are recorded and also feature in periodic social monitoring report. A review of the grievance register indicates that one new grievance was reported in May 2024 regarding tree damage that occurred during the construction of a boundary wall. The grievance was resolved by compensating the affected party. ERM has reviewed the grievance register along with the compensation payment vouchers and has confirmed that the issue was addressed appropriately. No additional grievances raised in the monitoring period of 5th E&S monitoring.		*Action closed as per the Jul- Sept 2024 E&S monitoring report with implementation to be ongoing.*

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
				ES monitoring report.				
2.13	Check effectiveness of GRM for workers through review of grievance records, action taken report, workers' consultations etc.	S. No 2.1 & 2.14, Table 3.1	UMPL	GRM implementation evidence		GRM functions were observed to be operating effectively. A Grievances recording system is in place and are being documented thoroughly.		*Action closed as per the Jul- Sept 2024 E&S monitoring report with implementation to be ongoing*
3.	**IFC PS 2: Labour and Working Conditions**							
3.1	Update UMPL HR policies to ensure alignment with IFC PS-2 requirements as well as BLA 2006 requirements.	S. No 2.1, Table 3.4	UMPL	Updated HR policy		In previous audit report for the period July-Sept 2023 visit, it was reported that UMPL management has updated their HR policy and got it approved by board of directors of the company.		*Action closed as per the Jul-Sep 2023 E&S monitoring report*
	Establish Welfare Fund and Participation Fund as per section 234 of Bangladesh Labour Act 2006		UMPL	Documentary evidence of compliance		Every company to which this requirement of BLA 2006 applies, is required to allocate 5% of net profit of previous year for at the proportion of 80:10:10 to respectively the Participatory Fund, Welfare Fund and Workers Welfare Foundation Fund. As reported, UMPL is currently reviewing applicability of this requirement through seeking independent legal opinion and thereby will be taking necessary action.		UMPL to provide legal opinion documentation to the lender for their review and ensure compliance if found applicable
3.2	Facilitate approval of the service rules in coordination with the competent authority	S. No 3.2, Table 3.1	UMPL	Approved Service Rule		UMPL has applied for service rule approval on 31st July 2023 after updating their HR policy. Company has not received further response from Labour department on approval. However as per labour rule 2015, deemed approval is granted for service rule upon completion of three months since the date of application.		*Action closed as per the Jul-Sep 2023 E&S monitoring report*
3.3	Generate a list of contract workers documenting their overtime work status till date (beginning of construction phase till end of Jan'23), gaps with respect to overtime payment including arrears to be paid.	S. No 3.4, Table 3.1	UMPL in coordination EPC Contractor	OT work status spreadsheet for contract workers	Initiate payment disbursemen to eligible workers by April 2025 Disbursement completion audit by March 2026	As discussed in previous audit report, UMPL has agreed to ensure payment of differential amount of overtime hours performed and minimum wage payment to eligible workers in alignment with the revised minimum wage notification that was published in August 2021. In this regard, a detailed assessment on differential amount for eligible workers is prepared. In previous audits, reasons for delay in initiating disbursement of back wage have been discussed (Refer 3rd Operation phase E&S monitoring report for detail).		UMPL is advised to speed up the overall process of disbursement by giving focused attention on each step required to facilitate the disbursement process which includes updating databased for clarity on number of actual workers who are due to receive differential amount as well

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						In 4th Operation phase E&S monitoring visit (Feb 2025), it was apprised that an inventory of workers, including calculations of arrears has been done, verification of list of eligible workers is completed, and a committee has been formed to oversee the payment of back wages. Communication to the eligible workers for receiving differential amount and collecting their bank account details is started. The next steps toward initiating the process of disbursement of payment to eligible workers are as follows: • Opening of a bank account in the name of EPC contractor for fund allocation for disbursement to eligible workers by end of February 2025. The account will be solely for the purpose of back wages payment • Allocation of the arrear amount for total back wages payment including 10% contingency in the EPC contractor bank account by March 2025 • Initiating payment disbursement to eligible workers from April 2025 in batches based on available bank account details of the eligible workers. • Maintaining monthly records on status of payment disbursement to eligible workers from April 2025 • Undertake completion audit to assess fulfillment of the entire back wage payment process by March 2026 and accordingly back wage disbursement process will be declared closed. In 5th monitoring, it was observed that there has not been any significant progress for closing this action item. Three payment files were prepared for payment release for three workers so far. It was also noticed that database for all eligible workers for this back wage payment still has scope for improvement in order to make the process faster. There is also lack of clear cut time frame to complete the disbursement process.		as actual total amount that each identified are expected to get, intimation process to identified workers for seeking requirement documents from them for making the payment etc. UMPL is also advised to come up with revised clear cut timeline to complete the disbursement process and put in best possible effort to complete the task within the revised timeline.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
	Facilitate and complete payment of arrears to the contract workers identified with OT gaps in the list above.	S. No 3.4, Table 3.1	EPC Contractor	Evidence of payment of OT related arrears to the eligible workers.	Same as above	Same as above		Same as above
	Ensure OT payment to both direct and contractual workforce is undertaken in alignment with Bangladesh Labour Rules (BLR), 2015 from 1 Feb 2023 onwards	S. No 3.4, Table 3.1	EPC Contractor	Documentary evidence of compliance	Same as above	Same as above		Same as above
3.4	Every worker should be issued appointment letter by their respective sub-contractors of EPC contractor as required under section 5 of BLA 2006.	S. No 3.6, Table 3.1	EPC Contractor	Documentary evidence of compliance	Continuous	Following the last monitoring visit, it is assumed that all new workers have received appointment letters from their respective contractors or employers.		Regular follow-up with manpower supply agencies should be maintained to ensure that all new recruits receive their appointment letters on the first day of their joining. This will help confirm that all necessary documentation is in place and facilitate a smooth onboarding process for new workers.
3.5	EPC contractor should also comply with applicable provisions of BLA 2006 w.r.t records and registers required to be maintained as per BLA 2006	S. No 3.7, Table 3.1	EPC Contractor			Based on the findings from the last monitoring visit, it is assumed that the manpower supply agency, 'Man is Power,' will be maintaining the relevant compliance-related documents.		None
3.6	Ensure improvement of the driver accommodation conditions at the worker camp as per EBRD guidelines. Ensure the sanitation facilities at the driver accommodation at the worker camp is designed to provide workers with adequate privacy, including ceiling-to-floor partitions. Proper locking arrangements to be provided at	S. No 3.8, Table 3.1	EPC Contractor			Based on site performance in ERM's previous visit, it is being assumed that accommodation arrangement for workers would be in alignment of EBRD guidelines.		*Action closed as per the Oct-Dec 2023 E&S monitoring report with implementation to be ongoing* Not Applicable in *Jul- Sept 2024 E&S monitoring report*

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
	all doors of the temporary toilet rooms/ units on-site.							
3.7	Remove/replace electric hand power tools using defective/frayed wiring. Appoint designated personnel having valid license for supervision of electrical works and carrying out work on high voltage electrical installations.	S. No 3.12, Table 3.1	EPC			As observed during the site walk round, handheld power tools being used were found to be equipped with earthing provision and the same is checked monthly using dedicated electrical inspection checklist. As recommended in the last audit, the site has now made provision of double earthing across all arc welding machines in use at the hot work areas onsite. The electric pumps/motors at the worker camp Water Treatment Plant (WTP) have also been equipped with double earthing except for a few which was actioned and completed during the course of the audit. The site has appointed electricians having wireman and supervisory permit to conduct installation and operation of medium and high voltage electrical works in accordance with the provision of Electricity Rules, 2020. Review of sample supervisory certification for two designated electrical supervisors reveals the certificate is valid for undertaking Class A, B and C type electrical equipment installation and maintenance.		*Action closed as per the Apr-Jun 2024 E&S monitoring report*
3.8	Make provision of standalone lighting at the worker restroom/shelters at the main plant site. Share periodic illumination monitoring records for review and validation. Update the GW monitoring program as specified in S. No. 3.13 of Table 3.1 of the 1st E&S monitoring report.	S. No 3.13, Table 3.1	EPC			As noted during the previous monitoring, the site continues to ensure provision of adequate illumination at all restrooms/shelters provided onsite. Reportedly and documentation review indicates that the site undertakes periodic illumination monitoring for all work areas to assess compliance with the illumination standards prescribed. Review of the monitoring records for the period Nov2024- Jan2025, indicates that UMPL has undertaken illumination monitoring at the following areas viz. steam turbine, gas turbine, dormitory building, monitoring basin, demineralization plant, control building, dormitory, main gate, raw water pump house, cooling tower area, emergency lighting (all areas), control rooms, switchyard, oil storage tanks, transformers and		Action closed during the 4th ESAP monitoring.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						outdoor switchgears with results found to be in compliance with the BNBC 2020 standards. For the groundwater monitoring program, please refer to S. No. 2.10 of this Table.		
3.9	Ensure locking out (de-charging and leaving open with a controlled locking device) and tagging out (warning sign placed on the lock) devices during service or maintenance. Ensure all hot work activities is performed with use of proper barrier screens and in presence of a standby "fire watch" at all times. Provide toe board with the exiting hard barricading at open end of floor/platform as per BNBC norms. Implement standalone work permits for height work and confined space entry. Ensure provision of SCBAs, rescue watch, first aid etc. for all activities involving confined space entry. Conduct Job Safety Analysis (JSA) for all high hazard activities being undertaken Share details of the Safety Committee composition along with meeting minutes.	S. No 3.14, Table 3.1	EPC	Safety Record Book	March 2026	*Electrical Safety* With respect to electrical safety, the site has marked the hazardous areas (electrical rooms, installation etc.), with appropriate safety signages and warning signs. The site uses electrical hand power tools with proper earthing, which is subjected to monthly inspection based on a defined checklist and records maintained. Also as recommended, the site has implemented a robust Lock Out Tag Out (LOTO) program/permit system, which was evidenced during the current monitoring period._Furthermore, the bulk diesel storage tank (~1200 litres capacity) at the fire pump room has been equipped with dual earthing in accordance with the provision of the Petroleum Rules, 2002. The site has inspected 30 earth pits on 15 October 2024 through in-house electricians having valid license for Class A, B & C electrical equipment installation and maintenance. As per the letter dated 9 April 2023 from Chief Electrical Inspector, the site has obtained validation and approval of earthing system. The site has provided insulation mats in front of electrical panels._As verified during the current assessment, annual inspection and certification of electrical wiring and earthing systems have been completed in accordance with the Bangladesh Labour Rules (BLR), 2015 requirements. An Electrical Wiring Assurance Certificate has been issued for the Meghnaghat Power Plant on 22 December 2025 by a licensed electrical supervisor/authorized institution M/s SM Enterprise, confirming compliance of the electrical installation with applicable regulatory provisions. The certificate is valid for one year from the date of issuance. *Hot Work*		The site must maintain a Safety Record book as per BLR.2015 requirement.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						For hot work-related activities, the site has implemented a work permit system which requires all personnel performing such work to possess requisite competency, use appropriate PPEs and safety equipment viz. flame arrestors, make provision of necessary firefighting equipment at the hot work area etc. Sample document review and physical visit to the site indicates that the site made provision of fire blankets and stand by "fire watch" in the work permits as per the IFC General EHS Guideline requirements. Sample inspection of the work areas also indicate the workers involved in such high hazard activities are equipped with appropriate PPEs. *Safety Committee* In accordance with the BNBC, 2020 requirements, a Safety Committee has now been constituted to efficiently manage all safety related affairs. The GE-Site in Charge acts as the head of the Committee which meets on monthly basis. Documentation review indicates monthly safety committee meeting minutes being maintained and corrective actions identified. The site has constituted a safety committee on 20 October 2024 consisting of 21 members from management, UMPL PLC and EPC and headed by Mr. Jason Jung (COO & PM) which is valid till 19 October 2026. The second quarterly meeting has been held in October 2025 and minutes of meeting has been shared for review. *Safety Record Book* Documentation review indicates that UMPL has developed a Safety Record Book (Doc. No. UMPL-NEPCS-EHS-F-046, effective April 2024) in line with the Bangladesh Labour Rules, 2015 requirements. <u>However, detailed information required under the Rules was not fully populated and the record book was not observed to be displayed at conspicuous locations onsite during the current assessment. Specifically, information related to hazardous</u>		

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						machinery/chemicals, personal protective equipment requirements, fire drill records, electrical inspection details, safety committee and training records, and documented safety measures was found to be either incomplete or not clearly maintained in the Safety Record Book. Further updating and proper display of the record book are required to ensure full regulatory compliance. *Height work* As observed during the site walkaround, every open side floor/platform including stairways of under construction building onsite is provided with temporary hard barricading of appropriate height. Also as recommended in the ESAP, the hard barricading railing for such buildings were now provided with toe boards as per BNBC requirements. In this regard and as earlier recommended, site has developed and implemented a standalone height work permit system with all scaffolds being provided with coloured tags specifying its "USE/NO USE" status. Inspection of sample areas indicated workers operating on such scaffolds equipped with appropriate PPEs like safety harnesses etc. For ladders being used, an inspection checklist is also found to be available and implemented. *Confined Space Entry* In consistent with the earlier monitoring report review of the sample work permit for confined space entry for commissioning indicates that oxygen and LEL levels are now being monitored and values are also being documented in the work permit. *Excavation Work* Documentation review and physical visit undertaken indicates that the site has developed and implement a permit system for excavation work with barricading now being provided near open trenches/drains near ST building, dormitory building and fire pump room. *Machine & Equipment Safety*		

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						Reportedly, site is involved in the operation of lifting equipment in the form of Cranes, chain pulley blocks, lifts etc. for operations. The aforesaid lifting equipment's has been inspected and certified by Liftsol Bangladesh Company having valid approval from Department of Inspection for Factories & Establishment, Bangladesh in form-20 dated 16 May 2024 valid for two years. The inspection records are also maintained in prescribed format (Form 24) as specified in the Bangladesh Labour Rules (BLR), 2015._Regulatory Metering Station (RMS) at the main plant site has now been provided with proper access control. Photographic evidence has been shared for the same.		
3.10	Develop and implement a robust near miss recording system. Conduct regular training of the workforce to enhance awareness on "near miss" definition to improve overall reporting. Update the training program to encompass the refresher training and its frequency. Maintain separate records for all refresher training being provided.	S. No 3.15, Table 3.1	EPC			Documentation review indicates that site has implemented a safety induction program for the workforce with records found to be maintained. Reportedly and as noted during the documentation review, the site records and reports near miss as part of the monthly EHS KPI report. In this regard, a near miss reporting system has been established and awareness campaigns being undertaken on a monthly basis. Reportedly, refresher trainings are being conducted however the frequency of such trainings have not been defined under the training program and records documented.		*Action closed as per the Jan-Mar 2023 E&S monitoring report.*
3.11	Develop and implement occupational noise monitoring plan for workers operating nearing high noise equipment viz. batching plant, grinding machines, concrete mixers etc. and maintain records for the same.	S. No 3.16, Table 3.1	UMPL and O&M Contractor	Workplace Noise Monitoring Report	April 2026	The site has prepared high noise map zone covering a total of 7 areas within main plant viz. main gate, HRSG, dormitory, batching plant, jetty, RMS and STG. Documentation review indicates noise is monitored at these locations 4 times in a day on a monthly basis. In consistent with the ESAP recommendation, the site has undertaken monitoring of occupational noise levels near high noise generating equipment and operations (diesel generator sets, cranes, batching plant, grinding and		Conduct workplace noise monitoring for all 12 high noise locations as identified in the Occupational Noise Monitoring Procedure.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						concrete mixing operations) with results found to be in compliance with the threshold occupational exposure limit of 85 decibels specified under the IFC General EHS Guidelines. The site has developed an Occupational Noise Monitoring Procedure (Document No. Sun-NEPCs-EHS-22 dated 01 April 2024), which identifies 12 locations within the plant as high-noise areas along with monitoring requirements and control measures. Review of workplace noise monitoring records (November 2024–January 2025) indicates that noise monitoring has been undertaken in key operational areas such as the Steam Turbine Area and Gas Turbine Area, where recorded equivalent noise levels ranged approximately between 47.43 dB(A) and 71.23 dB(A). These values are within the occupational exposure limits of 85 dB(A) specified under the IFC General EHS Guidelines and Bangladesh Labour Rules, 2015. However, monitoring records for several other identified high-noise areas (as specified in the Occupational Noise Monitoring Procedure) were not available for verification during the current assessment. This indicates that workplace noise monitoring has not yet been comprehensively conducted across all designated high-noise locations, and further coverage is required to ensure complete occupational noise exposure assessment and effective implementation of control measures.		
3.12	Ensure all LPG cylinders at the worker camp and main plant are being stored in covered storage and chain linked. For temporary/satellite LPG storages onsite ensure display of appropriate hazard communication.	S. No 3.16, Table 3.1	EPC			As observed during the site walkthrough, appropriate hazard and safety signages was observed to be displayed at the designated LPG storage area at the worker camp and construction site along with copy of the MSDS (in both English and Bangla). Also as recommended in the earlier monitoring report, the site has made effective provision for chain-linking of the LPG cylinders at storage and usage areas onsite. In this regard, the site has also developed a Compressed Gas Cylinder Management procedure		*Action closed as per the Jul-Sep 2023 E&S monitoring report.*

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						which outlines the process of cylinder unloading in consistent with industry best practices.		
4.	**IFC PS 3: Resource Efficiency and Pollution Prevention**							
4.1	Review and validate the project main and bypass stack design in consistent with the IFC General EHS Guidelines requirements. Prepare and implement a Noise Prevention & Control Plan for operations to ensure compliance with the applicable noise standards at the sensitive receptors (both day and nighttime)	S. No 4.1, Table 3.1	UMPL			The HRSG stack height of 75m has now been validated in accordance with the IFC General EHS Guidelines and is found to be line with the requirements, which specifies the minimum stack height to be 72.5 m. The site has prepared a Noise Prevention and Control Plan for operations with noise barrier wall (~3m height) reportedly to be constructed on top of the project boundary wall for which the budget has already been approved by UMPL Board of Directors. Reportedly construction of boundary and retaining wall is expected to commence in Dec 2023 and be completed by Mar 2024, with the installation of noise barrier expected to be completed by August 2024. In this regard, documentation review indicates that the site has already prepared the approved design documentation for boundary & retaining wall including the noise barrier. Signed agreement is also available with the concerned vendors for construction of the boundary wall and noise barrier along with supply of materials for erection of the noise barrier. As informed by UMPL EHS team during current site visit, the construction of 3m boundary wall has been complete and post completion of the wall construction, noise barrier installation is expected to commence sometime in November 2024. During the current monitoring it was observed that Noise barrier construction has been completed and work completion certificate has been issued to contractor M/s CSI Construction Limited on 20 March 2025.		*Action item closed during current monitoring*
4.2	Perform annual quantification of GHG emissions during operations in accordance with internationally	S. No 4.2, Table 3.1	UMPL	Report on the implementation progress of CCRA study	CCRA Implementation- December 2026	UMPL has conducted a comprehensive Greenhouse Gas (GHG) emissions assessment through a BAB-accredited third-party consultant, Envoage Sustainable Solution Ltd. The assessment covers		A time-bound action plan for CCRA implementation has been prepared, with clearly defined responsibilities,

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
	recognized methodologies and good practices. Facilitate implementation of the Climate Change Risk Assessment (CCRA) Study Report					Scope-1, Scope-2, and Scope-3 emissions for the reporting period January 2025 to December 2025. The total estimated GHG emissions for the reporting year are approximately **666,574 tCO_2e**, comprising direct emissions from fuel combustion (Scope-1), indirect emissions from purchased/imported electricity (Scope-2), and other indirect value-chain emissions (Scope-3). The major emission sources identified include natural gas and LPG combustion for power generation, purchased electricity consumption, upstream fuel extraction and transmission activities, purchased goods and services, waste generation, employee commuting, and other operational indirect emission sources. The emission quantification has been carried out following internationally recognized methodologies based on the IPCC Fifth Assessment Report (AR5) guidelines, using activity data combined with appropriate emission factors. The assessment primarily applied a spend-data/activity-data approach for Scope-3 categories along with standard emission factors from recognized global databases to ensure consistency and comparability of results. Review of the CCRA implementation tracker indicates that annual GHG emissions quantification (Scope 1, 2, and 3) has been completed as part of ongoing climate performance monitoring and is planned to be continued annually under the responsibility of the EHS team. Implementation of the Climate Change Risk Assessment (CCRA) recommendations is currently in progress, with overall status recorded as ongoing. Key actions underway include integration of climate risk considerations into operational planning, identification of energy efficiency and GHG mitigation opportunities, strengthening flood risk management measures including drainage preparedness, and enhancing climate-related reporting and awareness across operational teams. The responsibility for implementation primarily rests with the operations		measurable milestones, and monitoring parameters. The current focus is on tracking effective implementation against the established timelines and ensuring timely completion, while facilitating integration of climate risk mitigation measures into operational planning and decision-making.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						team, with an internal target timeline extending up to December 2026 for full implementation of the identified measures. These initiatives are expected to improve climate resilience, operational preparedness, and environmental performance of the facility.		
4.3	Install flowmeters for all borewells at the site and camp. Maintain water consumption records from such borewells and report it as part of monthly EHS KPI report being generated.	S. No 4.3, Table 3.1	UMPL & EPC			Reportedly, the worker camp has now been demolished and the borewell previously installed at the camp location is no longer operational. At present, no groundwater extraction is being undertaken at the site. Water requirements for construction and operational activities are being met entirely through surface water sourced from the Meghna River. The site continues to maintain records of surface water consumption, and the details are reported as part of the monthly progress report KPIs, in line with earlier recommendations.		*Action closed as per the Jul-Aug 2023 E&S monitoring report.*
4.4	Conduct analysis of the riverbed sediment for any potential contaminants by engaging laboratories outside Bangladesh. Implement sediment control measures for the riverbed sand being used for levelling at the worker camp.	S. No 4.4, Table 3.1	UMPL & EPC			As mentioned in the last monitoring report, UMPL has now undertaken analysis of the riverbed sediments (4 samples) by engaging a third-party agency – *ALS Technichem HK Pty Ltd*, to assess for any potential contaminants viz. PAHs, PCBs, BTEX, TPH and heavy metals. Review of the results with respect to the Dutch Soil Standards (in absence of any national soil standards) reveals in all the cases the concentration of the aforesaid contaminants to be well below the target and intervention values (as presented in the aforesaid standards), which is not indicative of any potential contamination. During the site walkthrough it was noted that arrangements has been made to prevent overflow of riverbed sand to adjoining community land parcels etc. through use of sandbags. Also observed during the last and current monitoring visit, the site has implemented erosion control measures such as grass matting on the riverbed sand slopes of worker camp/accommodation area.		*Action closed as per the Jan-Mar 2023 E&S monitoring report*
4.5	Update the WMP as per the ESAP recommendation to cover all major waste streams. viz. drill	S. No 4.5, Table 3.1	UMPL and O&M Contractor			In line with recommendation made in the 3rd ESAP Monitoring report, the site placed a request for		*Action item closed during 4th ESAP monitoring*

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
	cuttings and drilling mud during gas pipeline laying; riverbed sediment from construction of water intake & outfall structures; and septic tank sewage sludge.					analysis of sewage sludge through a third-party agency (EQMS) for the following parameters – copper, molybdenum, zinc, arsenic, nickel, lead, cadmium, selenium, benzene, xylene and ethylbenzene in accordance with the Bangladesh Sludge Management Guidelines. The site has undertaken STP sludge monitoring from workers camp prior to decommissioning as per schedule-2 of BECR 2023 and the results are within permissible limit. The EPC consortium has also developed a Sewage Sludge Management Plan which outlines the measures for the treatment of sewage and disposal of sewage sludge generated from the process through licensed waste disposal agencies. Reportedly, the same will be undertaken during the decommissioning of the worker camp following operations. For operations, sludge will be generated from the Effluent Treatment Plant (ETP) and Sewage Treatment Plant (STP), which reportedly will be disposed through authorized third-party vendors. The site has developed a Sludge Management Procedure (Document No: Sun-NEPCS-EHS-24 dated 1 April 2024) for operation phase._The plan includes details regarding sludge generation, storage, handling and disposal and the requirement to analyze the waste sludge prior to identifying the appropriate disposal methodology in accordance with the Bangladesh Standards and Guidelines for Sludge Management.		
4.6	Create a centralized, covered and paved hazardous waste storage facility at both main site and construction camp. All hazardous waste storage containers at the said facility to be appropriately labelled bearing hazard codes. Maintain a waste inventory and manifests for hazardous waste being generated and collected	S. No 4.6, Table 3.1	UMPL & O&M Contractor	Copy of waste inventory and manifests. ECC of the third-party waste facilities Audit report of third party waste facilities	As on when generated	The site has established a centralized hazardous waste storage area as per the ESAP recommendation. The hazardous waste comprising of used oil was found to be kept on a paved area with spill kit and firefighting and eyewash provisions. The site has developed a Waste Management Procedure (Document No. SUN-NEPCS-EHS-10 dated 01 April 2024) for operational waste management in alignment with applicable Bangladesh regulatory requirements and IFC EHS Guidelines. A colour-coding system for waste bins has been implemented		Ensure availability of ECC copy of third-party hazardous waste vendors and compatibility before disposal of hazardous, bio-medical and e-waste. Conduct periodic audit of all the third-party facilities to ensure proper waste management.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
	from site in accordance with the WMP requirements.					to facilitate segregation of hazardous and non-hazardous waste at source. Hazardous waste is stored in a designated newly constructed shed with impervious flooring, appropriate signage, and secondary containment provisions. During the current monitoring visit, approximately five drums of used oil were observed stored within the hazardous waste storage shed. No ETP sludge has been generated to date. Records indicate that no hazardous waste disposal occurred during January–December 2025, except for disposal of approximately 26 tonnes of general waste through Akota Enterprise, which reportedly forwards the waste to a municipal landfill; a site assessment of Akota Enterprise was conducted on 31 January 2026. The site has identified Sultan Oil, holding a valid ECC from the Department of Environment (DoE), for disposal of used oil and oil-soaked cotton waste. Additionally, mud cake generated from the STP and stormwater basin is being reused for onsite gardening purposes. However, the site has not yet identified authorized agencies for biomedical waste and e-waste disposal, and arrangements for future disposal of any ETP sludge (if generated) will also need to be confirmed with appropriately authorized third-party vendors to ensure full regulatory compliance.		
4.7	Ensure all hazardous and medical waste generated from the construction site and worker camp is collected and disposed through third party agencies having valid agreement and permission from regulatory authorities. Conduct screening audits to assess the performance of the waste treatment and disposal facilities/agencies identified prior to their engagement.	S. No 4.7, Table 3.1	UMPL & EPC			Based on the documentation review and interaction with UMPL and GE representatives, it is understood that collection and disposal of solid wastes (including hazardous waste) and biomedical waste from site is being managed through third party agencies – M/s Meghna Enterprise and M/s Prism Review of the agreement with Meghna Enterprise is found to be valid till 31 Mar 2024, while the agreement with Prism is found to be valid till November 2024. As earlier stated, Meghna Enterprise is not required to obtain Environmental Clearance Certificate (ECC) from DoE, Bangladesh for current nature of waste management activities. For Prism,		*Action closed as per the Oct-Dec 2023 E&S monitoring report.*

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
	Renew the biomedical waste disposal agreement with M/s Suveccha hospital.					ECC was found to be available and valid till 23 October 2024. Furthermore, in line with the ESAP recommendation, the EPC consortium has conducted an audit of Meghna Enterprises and Prism in Nov 2023 with records being maintained. As recommended earlier, a corrective action plan has also been developed as part of such audits in order to track closure of the audit recommendations.		
4.8	Make provision of emergency showers/eye wash at all hazardous chemical/fuel storage sheds of EPC. Avail and display concise version of MSDS of fuel/chemicals in Bangla language. Perform analysis of the transformer oil being used for the presence of PCBs. For oil storage at the worker camp, ensure provision of secondary containment and spill kit as per the Hazardous Material Handling and Storage Management Plan	S. No 4.8, Table 3.1	UMPL and O&M Contractor	Risk Assessment Report Photographic Evidence of Labelling	May 2026	The diesel, lubricant and engine oil storage containers were found to be kept at the designated covered fuel and chemical storage sheds marked with hazard labels/pictograms. Material safety data sheets (MSDS) were found to be available for the aforesaid areas in both English and local language as recommended in the ESAP. Similar observation was made at the standalone hydrogen storage building and bulk acid and storage tanks of hydrochloric acid, sulfuric acid and sodium hydroxide which are presently operational. Furthermore, the site has made provision of emergency eye wash at the aforesaid hazardous fuel and chemical storage areas including the diesel storage area at the worker camp and operational site. The emergency shower/eye-wash stations were found to be functional and also subjected to monthly inspection evident through the inspection tags observed. As per the evidence shared during current audit, the site has started maintaining information regarding the supply of specific PPEs (as outlined in the MSDS) in the form of vapour mask, hand gloves, splash resistant goggles and coverall for workers engaged in dangerous operations like handling of DM and cooling tower dosing chemicals etc. in Form 23 as per BLR, 2015. Furthermore, during the previous visit to the steam turbine building it was noted that at least 10 drums		Conduct a formal risk assessment for aqueous ammonia storage and handling. Ensure proper labeling of all containers (full/empty status)

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						bearing hydrazine (identified as highly flammable chemical per MSDS available) was found to be appropriately labelled to display the hazard signages. The site has also provided an emergency eyewash, spill kit along with proper secondary containment at the said location. During the site visit to the DM plant, bulk acid and alkali storage unit, bulk diesel storage tank (near fire pump room) and hypochlorite dosing unit/plant it was noted that UMPL maintain physical copies of MSDS of the chemicals (PAC, diesel, sodium hypochlorite, HCl and NaOH) used/stored in the aforesaid area; the chemical MSDSs were displayed in all such areas as per provision of BLR, 2015. The site has provided spill kits at the following chemical storage and handling areas viz. water purifying chemical storage room (DM Plant), bulk acid & alkali storage unit and bulk diesel storage (fire pump room) as per specific MSDS requirement. Display of hazard labels and precautionary signages has also been provided on bulk storages of diesel, HCl, NaOH and NaOCl. Key gaps/deviations identified include: • During the current monitoring visit, it was observed that nine HDPE drums (200 litres each) of aqueous ammonia were stored in the designated storage room within the steam turbine building, of which six drums were full and three were empty. Secondary containment has now been provided for the stored drums. However, proper labelling was not found on the containers to clearly distinguish between full and empty drums, which may pose handling and identification risks. • It was further noted that risk assessment specific to aqueous ammonia storage and handling has not yet been conducted. Gas masks have been provided to employees handling aqueous ammonia containers, indicating some level of precautionary safety measure. The chemical		

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						compatibility matrix displayed in the storage area has been updated, and no incompatible chemicals were observed stored in the same room during the current assessment		
4.9	Obtain and share the renewed license of the third-party agency involved in pest control activities onsite. Discontinue the Bromadiolone and any WHO Classified Hazard Class Ia (extremely hazardous); or Ib (highly hazardous) pesticides. Update the Pest Control Procedure to introduce pesticide screening and selection based on WHO Recommended Classification of Pesticides.	S. No 4.9, Table 3.1	UMPL & O&M Contractor			UMPL has engaged a third-party agency (A-1 Pest Specialist Ltd.) for performing pest control activities onsite and camp on a weekly basis. Documentation review indicates that the license of the aforesaid agency as issued by the Department of Agriculture, Plant Protection Wing, Bangladesh is currently valid till 27 October 2026. As reported the agency uses the following pesticides onsite viz. Lambda Cyalothrin, Cypermethrin, Permethrin and Darsbun, which do not fall within the category of Class Ia/Ib pesticide as per WHO classification. EPC has also updated the Pest Control Procedure (U-EHS-PD-037) to clearly prohibiting the selection and use of WHO Class Ia and Ib pesticides with same now being communicated to the pest control agency.		*Action closed as per the Jan-Mar 2024 E&S monitoring report.*
5.	**IFC PS 4: Community Health, Safety and Security**							
5.1	Obtain relevant certification from concerned agency stating that the power project buildings/structures conform to BNBC requirements prior to commencement of operations. Conduct HAZOP study of the natural gas pipeline – identified as an associated facility of the project through a reputed third-party agency. Implement the recommendation of the HAZOP study in the natural gas pipeline design.	S. No 5.1, Table 3.1	UMPL & EPC			Vysus China Inc. was engaged NEPC to carry out a HAZOP study of the power project. Review of the HAZOP Report dated 8 October 2021 indicates that it covers the following: *Main & Secondary Cooling Water System; Water Supply and Treatment; Demineralized Water System; Biocide Dosing System Cooling Water; Closed Cooling Water; Wastewater; Hydrogen Storage and Distribution; Compressed Air System and Fuel gas system.* As specified in the Oct-Dec 2022 monitoring report, HAZOP study has been extended to cover the natural gas pipeline. As discussed, and recommended in the last monitoring report, the HAZOP report has been updated to include the gas pipeline node to assess the provision of appropriate engineering controls. The review of the report indicates that there are no		*Action closed as part of the Jul-Sep 2023 E&S monitoring report.*

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						recommendations with respect to the gas pipeline node safety risks and controls available.		
5.2	Prepare and implement a medical screening procedure for all workforce engaged in the project. Undertake specific medical test viz. audiometry, vision, colour blindness etc. for specific target worker groups based on the nature of work to be performed. Ensure the sanitation facilities at the driver accommodation at the worker camp is designed to provide workers with adequate privacy, including ceiling to floor partitions. Proper locking arrangements to be provided at all doors of the temporary toilet rooms/units onsite. Make provision of additional first aid boxes and certified first aiders at the main plant site as per BNBC norms.	S. No 5.2, Table 3.1	UMPL	Annual Health Check-up report of UMPL employees		Reportedly and as observed during the earlier and current visit, the EPC consortium have made provision of a total of sanitation facilities at the main plant site to prevent exposure to water/vector borne disease resulting from improper sanitation and hygienic conditions. In addition, as per the ESAP recommendation, adequate toilet facilities have also been provided at the UMPL/NEPC/GE employee cabins at the worker camp for both males and females. The aforesaid sanitation facilities are adequately lighted and observed to be subjected to daily cleaning by designated housekeeping team. As recommended in the ESAP and the Oct-Dec 2022 monitoring report, the worker sanitation facilities has made provision of privacy arrangement at the worker sanitation facilities at the camp. Regarding the preparation of worker pre-employment and periodic medical surveillance procedure, the same has now been prepared and documented as U-EHS-PD-043. The procedure outlines the list of health screening parameters to be checked based on the nature of work activities. Reportedly EPC Consortium undertakes pre-employment medical screening of all workers (including security and housekeeping workforce). As earlier recommended, the site undertakes specific tests like audiometry, vision and colour blindness for designated target groups along with blood tests, ECG etc. and the same was validated as part of the sample medical records review undertaken during the current visit. With respect to first aid, as recommended in the ESAP the EPC consortium has now made provision of a 14 first aid box at the main plant site and worker camp. The first aid box contents are subjected to periodic checks based on a defined checklist. Reportedly, a total of 22 trained and certified first aiders have been deployed onsite with name and		Conduct annual health check-up for UMPL employees engaged in plant operation.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						contact details of the first aiders being displayed at the worker resting areas onsite. For operations, NEPC-S has developed an occupational health surveillance checklist for operations workforce which is to be implemented on an annual basis. As specified in the Jan-Mar 2024, the O&M team is required to undertake pre-employment medical examination of the operational workforce (~80) through a registered practitioner and issue a certificate of fitness in Form 26(A) and maintain the heath examination records in Form 26 as per the provision of the BLR, 2015. In view of the above recommendation, UMPL has reportedly undertaken pre-employment medical examination of 72 O&M workforce and 19 contractual workers with the records maintained in a health register (From 26). Sample fitness certification in Form 26(A) has also been shared for few workers. Furthermore, the site has also developed and implemented an Occupational Health Surveillance Procedure (SUN-NEPCS-EHS-002 dated 01 April 2024) to this regard. <u>However, as informed by UMPL site representative no annual health check-up is being performed for the UMPL employees engaged in plant activities.</u>		
6.	**IFC PS 5: Land Acquisition and Involuntary Resettlement**							
6.1	Facilitate engagement of LRP implementation monitoring agency on a fast-track basis.	S. No 6.2, Table 3.1	UMPL	Engagement letter of LRP agency LRP implementation report		LRP implementation agency (i.e. M/s. Sajida Foundation) and External Monitoring agency for LRP implementation (i.e. M/s. SSCL) are already on board and implementation activities are progressing as planned in their inception report. Current update on LRP implementation based on is provided in sub-section 3.2 of this report.		None
7.	**IFC PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources**							
7.1	Promote local fish breeding site in in consultation with the Fishery	S. No 7.2, Table 3.1	UMPL			In consistent with the recommendation of the Oct-Dec 2022 monitoring report, UMPL has engaged with		*Action item closed during 4th ESAP Monitoring*

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
	Department as per ESMP requirement.					the Upazila Fisheries Department and local fishermen group with respect to promotion of local fish breeding sites. In this regard, the site was also visited by the local Fisheries Department Officer, who recommended the release around 100kgs of carp fish fingerlings of local species such as *Ruhi, Katla, Kalibaush, Mrigel & Sorputi, Bata* etc. by end of July to August when water level will be higher, and fishes get enough oxygen and natural feeding provisions. This is also captured as part of the UMPL Corporate Social Responsibility (CSR) Plan. As part of first phase of the plan, UMPL has released 120kgs of fish fingerlings (ruhi, katla, kalibaush, mrigel, grass carp and sorputi) in the Meghna River on 27th August 2023. In the ceremony, UMPL Site personnel, EPC personnel, Fisheries Dept. personnel, community people and fishermen were also present, and it was well appreciated by the local fishermen. A meeting was organized with the local fishermen on 21 Feb 2024 to assess the implementation of the fish breeding program. Key observations from this engagement have been presented below: • 50% of the released fish could not be sustained as those fish fingers were caught by the bamboo structures/cages at the bank of the river. The fish were sold to the nearby markets. • For the future release, the fishermen advised to release the fishes to a different location away from the cages. *Jul- Sept 2024 E&S monitoring report:* On October 6, 2024, UMPL successfully completed the second and final phase of its fish breeding initiative by releasing 130 kg of fish fingerlings into the Meghna River. The species released included ruhi, katla, kalibaush, brigade, grass carp, silver carp, and bata. The ceremony was attended by UMPL and EPC personnel, local community members, and fishermen. In response to feedback received during the first phase and ongoing monitoring discussions, the fingerlings were released in multiple locations. Some		

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						were released from the river ghat, while the majority were distributed throughout the river using a boat. The community and fishermen expressed their appreciation for UMPL's efforts to promote local fish breeding. UMPL also requested that fishermen and community members refrain from fishing for the next two months to allow the fish to grow. This approach aims to increase the size and value of the catch, ultimately benefiting local families.		
8.	**IFC General EHS Guidelines & IFC EHS Guidelines for Thermal Power Plants**							
8.1	Develop and implement a dust control procedure for managing fugitive emission from construction activities/operation in accordance to the "*IAQM Guidance on the assessment of dust from demolition and construction.*"	S. No 8.1, Table 3.1	EPC			In consistent with the recommendation specified in the Oct-Dec 2022 monitoring report, the EPC Consortium has now developed a standalone "Dust Control Procedure" as per the IAQM guidance document as recommended in the ESAP. As specified in the plan, the EPC consortium has made provision of designated area for concrete mixer and vehicle washing, with the wash water getting collected in the stormwater basin constructed. Also, with the project now in operations, only limited volume of wash water is generated from commissioning activities.		*Action closed as part of the Oct-Dec 2023 E&S monitoring report.*
8.2	Update the Environmental Monitoring Plan for construction to undertake monitoring of treated sewage and storm water discharges from the main plant and worker camp to assess conformance with the discharge standards specified in BECR, 1997 and IFC Sectoral EHS Guidelines. Make provision of proper drainage arrangement at the construction plant site to prevent water stagnation. Ensure provision of sedimentation tank for collection and treatment of vehicle wash water. Ensure functionality of batching plant wastewater treatment system in	S. No 8.3, Table 3.1	UMPL, EPC & O&M Contractor			The EPC consortium has installed a modular STP at the worker camp in accordance with the ESMMP requirements. The treated effluent from the modular STP is currently being discharged into the nearby natural sewer/drainage channel. Review of the third party quarterly environmental monitoring report (Apr-Jun 2023) indicates that both treated sewage and surface run-off is being monitored to assess compliance with the discharge standards specified in Schedule 3 of the BECR, 2023 and IFC General EHS Guidelines. For further details, please refer to S. No. 2.10 of this Table. As earlier mentioned in the Oct-Dec 2022 report, the sewage at the main plant site for construction is being disposed into septic tanks and is periodically cleaned/removed through third party waste management agencies for disposal at an external location (not known). Design documentation of the		*Action closed as part of the Jul-Sep 2023 E&S monitoring report.*

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
	order to prevent wash water overflows. Share copy of construction site drainage plan and relevant design documentation to validate the design of the septic tank system being utilized for sewage disposal at the main plant site.					septic tank and soak pit has been shared for review and validation. In accordance with the ESMMP, wastewater generated from concrete batching plant in the form of washing of transit mixers, vehicles etc. along with surface run-off etc. to be subjected to treatment through temporary sedimentation tank prior to discharge into Meghna River conforming to the standards specified in the BECR, 2023. However as recommended in the Oct-Dec 2022 monitoring report, the site has made provision of designated washing bay with wash water getting collected in the stormwater basin being constructed. For the main plant site, the drainage plan shared indicate the provision of 2 outfall equipped with catch pits. For further details with respect to stormwater outfall monitoring please refer to S. No. 2.10 of this Table.		
8.3	Evaluate installation of automated bleed/feed controllers, and use of inert construction materials to reduce chemical treatment requirements for cooling tower. Select and use chemical additives devoid of heavy metals like chromium and zinc, being used as corrosion inhibitors. Apply intermittent shock dosing of chlorine as opposed to continuous low-level feed.	S. No 8.4, Table 3.1	UMPL, EPC & O&M Contractor			Review of the cooling tower design shared indicates use of inert material for construction. As per the Cooling Water Chemical Dosing System documentation, no specific additives are required except for sodium hypochlorite and sulphuric acid for dosing to prevent biofouling of the condenser and prevention of scaling respectively.		*Action closed as part of the Jul-Sep 2023 E&S monitoring report.*
8.4	Ensure all LPG cylinders (both empty and filled) are kept in covered storage and chain linked to prevent any accidental fall. All such cylinder to be marked as empty/filled as per BNBC norms. Update the monthly construction equipment inspection checklist to encompass gas-based welding	S. No 8.5, Table 3.1	UMPL & EPC			During the walkaround of the worker camp, reportedly empty LPG cylinders (45 kg capacity each) were found to be kept chain linked and in covered storage. Within the storage area, both the "empty" and "filled" LPG cylinders are separated out and marked for ease of identification. In view of the ESAP recommendation, the site has developed and implemented a Gas Cutting Equipment Inspection Checklist (U-EHS-PD-001) to assess the		*Action closed as part of the Oct-Dec 2022 E&S monitoring report.*

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
	equipment and maintain records of the same.					availability and functioning of the engineering safety controls viz. non-return valves, flash back arrestors, condition of LPG/oxygen lines etc.		
8.5	Perform characterization of waste sludge for operations and facilitate its reuse/disposal in accordance with the Bangladesh Standards and Guidelines for Sludge Management as notified by the Department of Environment (DoE), Bangladesh.	S. No. 8.6, Table 3.1	O&M Contractor			For operations, sludge will be generated from the Effluent Treatment Plant (ETP) and Sewage Treatment Plant (STP), which reportedly will be disposed through authorized third-party vendors. Per the design shared, ~72 kg of sludge is computed to be generated from the wastewater treatment operations. Presently the aforesaid treatment units have commenced operations since Jan 2024, with low volume of sludge generated till date. The site has developed a Sludge Management Procedure (Document No: Sun-NEPCS-EHS-24 dated 1 April 2024) for operation phase. The plan includes details regarding sludge generation, storage, handling and disposal and the requirement to analyze the waste sludge prior to identifying the appropriate disposal methodology in accordance with the Bangladesh Standards and Guidelines for Sludge Management.		*Action closed during 4th ESAP monitoring.*
8.6	Ensure providing a mechanical shaft to the pinion at all the concrete mixers being used at labour camp area. Provide adequate guard to the rotating part of the concrete mixer	S. No. 8.7, Table 3.1	EPC			During the site walkthrough it was observed that the portable concrete mixers being used have been provided with mechanical shaft to the pinion along with mechanical covering of rotating parts except for one, where wooden log is being used as shaft. Photographic evidence shared also indicates that movable guards installed for the rotating parts of the concrete mixers deployed while operating the machine.		*Action closed as part of the Oct-Dec 2022 E&S monitoring report.*
8.7	Arrange for nylon nets 3 m to 4 m below the working level along the periphery of tall buildings under construction at the main plant site.	S. No. 8.8, Table 3.1	EPC			As specified in the earlier monitoring reports, EPC Consortium has developed and implemented full body harness inspection checklist (U-EHS-PD-02). Documentation review indicates that this inspection is being undertaken on a weekly basis and records maintained. Furthermore, as the site has made provision of nylon nets for all exterior height work activities as per BNBC,2020 requirement and this was		*Action closed as part of the Jul-Sep 2023 E&S monitoring report.*

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						validated during the site walkthrough undertaken at the construction areas. During the Jan-Mar 2024 monitoring period no external height work activity was found to be undertaken requiring the provision of fall protection arrangement in the form of nylon nets as per BNBC requirements.		
8.8	Develop a driver guide on road and vehicular safety in consistent with the requirements of the Traffic Management Plan. Conduct campaigns and develop brochures to enhance community awareness on pedestrian safety.	S. No. 8.9, Table 3.1	UMPL & EPC			The project has developed a guideline for road and vehicular safety for drivers and nearby communication. Safety brochures have been prepared in local language in line with the above guidelines and also shared with local communities to enhance their awareness on road and pedestrian safety.		*Action closed as part of the Jul-Sep 2023 E&S monitoring report.*
8.9	Ensure periodic inspection of all firefighting equipment (particularly hose reels, hydrants, sand buckets) based on a defined checklist and maintain records for the same. Make provision for fire extinguisher and smoke detection system at the driver accommodation within the worker camp. Install fire extinguishers near all temporary electrical panels and LPG storages onsite (both camp and main plant). Ensure paints/varnishes storages onsite are constructed of fireproofing material.	S. No. 8.10, Table 3.1	EPC			Review of the firefighting equipment layout for both worker camp and main plant and site walkthrough indicate that the site has made provision of fire extinguishers, hydrants, hose reel boxes and sand buckets at strategic locations onsite viz. paint, chemical, hazardous waste storages etc. In addition, provision has also been made for temporary water storage facilities to serve for emergency firefighting. Smoke detection system has been installed at the worker camp offices and GE/NEPC/UMPL employee accommodation onsite. The site has also made provision of fire hydrant/hose reel system and smoke detection system at the driver accommodation. Wooden enclosure has been removed for the flammable chemical storages in conformance with the BNBC, 2020 requirements. Documentation review indicate that the site has obtained approval of the firefighting floor plan from BFSCD for the operational buildings which covers total floor area of 389989.4 sq. ft. The site has obtained fire license (Building Usage Class: Essential Service E-3 valid till 30 June 2024) for total floor area of 400371 sq. ft. The site has updated the current firefighting floor plan, and it has been		*Action item closed during current monitoring.*

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
						approved by BFSCD on 15 October 2024 for total floor area of 400371 sq. ft. In accordance with the BFSCD approved plan, site has made provision of active and passive fire protection system in the form of multi detectors, smoke detectors, sprinklers, gas detector, gas suppression system, manual call points, diesel storage area, emergency lighting etc. at strategic locations viz. hydrogen storage buildings, turbine and substation building. Based on document verification and site visit undertaken the site has amended the firefighting floor plan to include Nitrogen plant building, hypochlorite dosing unit building (for STP) and bulk acid and alkali storage unit and firefighting equipments has been installed accordingly. UMPL has obtained completion certification from Safety Wings to ensure proper installation of firefighting equipments as per approved firefighting plan on 12 January 2025. The site has engaged M/s Safety Wings as a third-party agency for annual inspection and maintenance of active and passive fire protection systems in line with BNBC, 2020 requirements. Annual maintenance of fire detection and firefighting equipment was completed in December 2025. A dedicated representative from Safety Wings is currently stationed at the plant during the general shift to support system upkeep and operational readiness. Gas-based fire suppression systems (GSS) remain installed in electrical rooms, and smoke detector–based fire detection systems are operational across the plant. During the current assessment, no loop failures, missing detectors, or defective alerts were observed in the fire alarm panels during the virtual site walkthrough. Additionally, Emergency Response Team (ERT) members have received external training on fire detection and gas suppression systems, strengthening competency for alarm acknowledgment, emergency communication, and response actions.		

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
8.10	Initiate conducting a Fire Safety assessment to assess the fire protection requirements	S. No. 8.11, Table 3.1	UMPL and EPC			As required under Section 8.1.3 of Project EHS Plan, Site is required to undertake a Fire Safety Assessment to verify and validate the design to assess the fire protection requirements. Reportedly the site has engaged Safety Wings to conduct the Fire Safety assessment. Review of the report dated 12 February 2023 suggests that in part-1 of the report BNBC 2020 requirements has been referenced followed by part-2 where a total of 22 buildings have been identified and details of fire-fighting equipment's required in each building has been listed down. The third party, safety wings has done two assessments on 16 January 2024 and 4 February 2024 to check the compliance status of firefighting equipment installation. As mentioned in the final assessment, installation of all kinds of Fire Protection & Detection System has been completed and complying to the NFPA & BNBC rules.		*Action closed as part of the Jan-Mar 2024 E&S monitoring report.*
9.	**IFC EHS Guidelines for Gas Distribution Systems**							
9.1	Facilitate installation of gas detection and alarm system at the RMS in consistent with the IFC EHS Guidelines.	S. No 9.1, Table 3.1	UMPL & EPC			As verified during the site visit, the site has installed a methane gas detection system in RMS building as per BFSCD approved firefighting plan.		*Action closed during 3rd ESAP Monitoring.*
9.2	Assess the occupational risks associated with gas pipeline laying and operation with respect to welding activities and considering the presence of any buried utility infrastructure in near vicinity. Coordinate with TGTDCL to ensure all confined space entry works are undertaken in accordance with a confined space entry procedure and appropriate work permits. Ensure usage of ventilation and oxygen / explosive level	S. No 9.2, Table 3.1	O&M Contractor			The site has completed with the pipeline laying activities across the Meghna River, with potential safety risk and mitigation measures being discussed under *"Method Statement of Fuel Gas Pipeline HDD Construction for Crossing the Meghna River" (UNQ/00/K/UEP--ADP/MS/038).* With project declared COD in Jan 2024 and gas pipeline in operations the aforesaid requirements could not be assessed at this stage.		*Action closed as part of the Jul-Sep 2023 E&S monitoring report*

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
	detection and alarm equipment prior to any confined space access.							
9.3	Identify and locate existing gas and other buried utility infrastructure, if any prior to excavation for installation or repair of gas pipelines. Ensure installation of visual marking of gas pipeline as part of installation and carry out purging of gas from pipelines prior to welding/cutting activities.	S. No 9.3, Table 3.1	EPC & O&M Contractor			As communicated by the UMPL construction team, there exists no utility infrastructure along the natural gas pipeline RoW. However, copy of supporting documentation to be shared for review and validation. Provision of visual marking of the natural gas pipeline supplying the project has already been installed and validated as part of the Jan-Mar 2024 monitoring visit.		*Action closed as part of the Jul-Sep 2023 E&S monitoring report.*
9.4	Develop and implement an O&M plan for the natural gas pipeline in coordination with TGTDCL. Submit the same to the Department of Explosives (DoE), Bangladesh.	S. No 9.4, Table 3.1	O&M Contractor & TGTDCL			With the gas supply pipeline currently in operation, development and submission of the O&M plan in accordance with the Natural Gas Safety Rules (NGSR), 1991 had earlier been pending, and UMPL had formally requested TGTDCL vide letter dated 27 October 2024 to submit the O&M plan to the Department of Explosives (DoEx), Bangladesh. During the current monitoring, it was informed that TGTDCL has verbally confirmed submission of the O&M plan to DoEx. However, a copy of the plan has not been shared with UMPL citing confidentiality constraints, as TGTDCL is a government agency.		*Action closed during current monitoring.*
9.5	Develop and implement an offsite emergency response and preparedness plan in coordination with TGTDCL. Communicate the potential hazards presented by the gas supply line, safety measure/controls in place and response measures to be adopted in case of any emergencies in the form of pipeline leaks/explosions.	S. No 9.5, Table 3.1	UMPL, O&M Contractor & TGTDCL			The site has developed an Offsite Emergency Response Plan (Doc No: NEPCS-M3-EHS-020 dated Jan 2024). Review of the offsite emergency response plan developed indicates that the site has properly identified offsite emergency scenarios like: • Fire & Explosion • Release of toxic gas • Oil & chemical Spill. • Chemical and heat Burns to human and livestock. • Overpressure shocks to human and livestock • Damage to private and public property.		Action closed during 3rd ESAP Monitoring.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
	Implement a telephone notification system to respond to reports of leaks or questions of general safety from the affected community and other interested parties.					Emergency mitigation & evacuation plan, communication procedure, roles & responsibilities are also well defined in line with the current operations E&S organogram in case of emergency along with emergency contact details. As recommended in the Jan-Mar 2024 monitoring report, the plan has now been updated to include list of the emergency response equipment, chemical and fuel inventory. The site has also included list of firefighting equipments and MSDSs of the chemicals/fuel being stored/handled.		
10	**IFC EHS Guidelines for Electric Power Transmission & Distribution**							
10.1	Ensure installation of marker balls for the power transmission line to prevent bird collisions.	S. No 10.1, Table 3.1	EPC			During the earlier visits it was noted that marker balls have been installed on the transmission lines to prevent bird collisions		*Action closed as part of the Jul-Sep 2023 E&S monitoring report.*
10.2	Ensure provision of effective grounding for the towers supporting the live transmission lines in accordance with the regulatory requirement.	S. No 10.2, Table 3.1	EPC			Reportedly, all transmission towers have been provided with effective grounding in the form of earth pits. The same has been subjected to inspection internally by the EPC consortium with records being maintained.		*Action closed as part of the Jul-Sep 2023 E&S monitoring report.*
10.3	Updated height work procedure to include work on transmission lines, rescue of fall arrested workers, use of rated hoisting equipment by trained operator.	S. No 10.3, Table 3.1	EPC			GE-NEPC consortium has developed a Work at Height Procedure (U-EHS-PD-016) which outlines the hazards associated with height including general and specific requirements to be followed for carrying out such high hazard activity. The procedure also specified the inspection and training requirements for effective implementation of the Plan. In additional to the above, there is also a Work at Height Rescue Plan prepared and implemented for tower erection works which includes a checklist for rescue actions along with procedure for notification, emergency response actions, rescue team risk assessment and medical evaluation and retrieval requirements. The contact details of both onsite and offsite emergency/rescue responders have also been furnished in the Plan.		*Action closed as part of the Jul-Sep 2023 E&S monitoring report.*
10.4	Develop and implement an EMF Safety Program prior to the	S. No 10.4, Table 3.1	UMPL & O&M Contractor			UMPL has developed a training module and implemented an EMF Safety Program as per the IFC Sectoral EHS Guidelines which includes source, effect		*Action closed as part of the Jan-Mar 2024 E&S monitoring report with*

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (January 2026)	Progress Status	Recommendations
	commencement of project operations					of EMF and safety controls along with roles & responsibilities during the operation. A training program has been conducted on 05 May 2024 which has been attended by 29 workers.		*implementation to be ongoing.*
10.5	Display cautionary signs and install barriers to prevent public contact with transmission towers located outside the project. Perform grounding of conducting objects (e.g. fences or other metallic structures) installed near power lines, to prevent shock.	S. No 10.5, Table 3.1	UMPL & O&M Contractor			As noted during the earlier monitoring visit, cautionary signages and safety barricading was evidenced for the transmission towers. Electrical grounding was also noted for the transmission tower footings in accordance with the IFC Sectoral EHS Guidelines.		*Action closed as part of the Jan-Mar 2024 E&S monitoring report with implementation to be ongoing.*

3.2 LIVELIHOOD RESTORATION PLAN (LRP) IMPLEMENTATION STATUS

UMPL had engaged Sajida Foundation as a LRP implementing agency and engaged SSCL as an external Monitoring & Evaluation Agency for LRP implementation. Based on discussion in 5th Monitoring, it was understood that LRP implementation activities stands completed and scheduled to be closed out by Feb 2026. It was also reported that all eligible PAHs for LRP benefit were eventually covered in the program. Outcome of the LRP implementation includes following mentioned key achievements:

- All 151 microbusiness and 145 livestock beneficiaries received complete support and refresher training, with most livestock holders maintaining assets despite seasonal challenges. Microbusiness adoption also progressed well overall
- The endline survey, launched in December by Sajida, began capturing income trends and household resilience for reporting in the final assessment.
- The static clinic continued uninterrupted for the 10th consecutive month, serving as the primary health access point for the community.
- As of December, 83 NCD patients were under active management, up from 77 in November.
- Service continuity and follow-up remained strong, with no disruptions noted in medication supply or clinic scheduling.
- A total of 48 integrated forums reached over 420 participants, sustaining the project's soft-skill and behavior change goals.
- Consistently high female participation (over 90%) reflected growing women's confidence in engaging with health, livelihood, and social topics.
- Internal assessments and field feedback indicated improved decision-making among forum participants, especially around healthcare-seeking behavior and small enterprise engagement.

The period from October to December 2025 marked the project's final push toward closure, with all livelihood interventions completed, uninterrupted delivery of static clinic services, and strong community engagement through active forums. Endline survey was expected to be complete by January and final project closure by Sajida is scheduled by February 2026.

UMPL had also engaged SSCL (Sustainability Safeguard Compliance Limited) as External Monitoring consultant for LRP monitoring. SSCL have submitted their bi-annual report for the year 2025 on LRP implementation and it indicates alignment of LRP implementation outcome with its desired objectives. SSCL is also entrusted with the responsbilty of monitoring CDP implementation and their latest submission is monitoring report for the period Kuly to September 2025 on CDP implementation progress.

3.3 STAKEHOLDER ENGAGEMENT PLAN (SEP) & GRM IMPLEMENTATION STATUS

A well-qualified and trained personnel in the capacity of Community Development Manager (CDM) engaged by UMPL, is leading stakeholder engagement activities at site, with the support of a dedicated field staff who sits in Community relationship office set up by UMPL in Doodhghata village, near plant gate. Based on ERM's consultation with community in Korbanpur village, it was noticed that community members are well aware of the formal engagement system established by UMPL and also quite familiar and comfortable with the CDM and his team in terms of sharing any sort of issues connected with the project activities.

UMPL Community Development team have established a system of documentation of their engagement with PAHs and other stakeholder. Minutes of meeting of all important meetings carried out by CSR Manager is documented for records. Community Development team have established a good connection with local stakeholder and also acting as chain of communication between UMPL Management and local community.

GRM system is well established. GRM process is displayed at notice board. Workers are informed about this at the time of their induction training. Grievance boxes are placed across multiple locations in plant area and campsite. It was noticed that workers are familiar with this system, and they hesitate a little in using the formal channel. Instead, they prefer communicating their issues with their respective site supervisors. Although workers are encouraged to use formal channel of GRM by site level executives. Community issues are being taken care of by Community Development department.

A review of the grievance register for the duration of 5th annual monitoring period indicates that there has not been any grievances raised by any project stakeholders during this monitoring period.

APPENDIX A PHOTO DOCUMENTATION

Photo 1: Noise barrier installation on boundary wall

Photo 2: Interaction with security guards

Photo 3: H&S KPI Board

Photo 4: Grievance Box Near Main Gate Security Cabin

Photo 5: Fire control panel in CCB room

Photo 6: CEMS display tab in CCB room

Photo 7: New EHS Policy displayed at site

Photo 8: Colour Coded bins for waste segregation

Photo 9: First Aid equipments at OHC

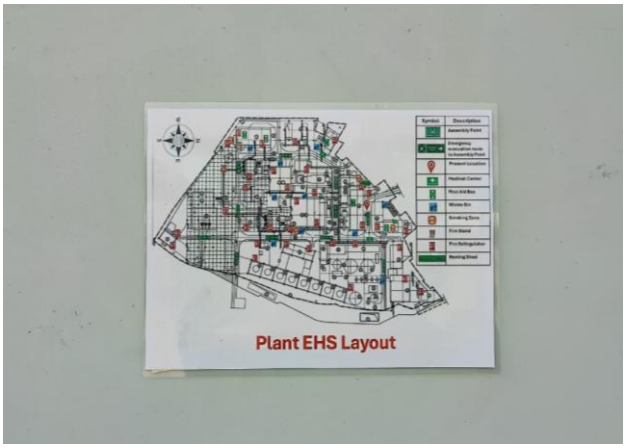


Photo 10: Updated site emergency layout displayed in CCB

Photo 11: Hazardous Waste Storage Shed

Photo 12: Secondary Containment at Aquas Ammonia Storage Room

Photo 13: Group discussion with villagers

Photo 14: Alternate livelihood for the female villagers

Photo 15: Medical Camp for the villagers

Photo 16: Computer training center for the villagers

[Source: UMPL]

APPENDIX B DOCUMENT/INFORMATION REVIEW LIST

- O&M Monthly Report
- Wastewater Management Procedure
- BIWTA License
- Hydrogen Storage License
- Acid Storage License
- BERC Power Generation License
- Renewed ECC for Power Generation
- Boiler License
- Environmental Monitoring Report
- DoE Test Report
- HIRA for Operation Phase
- Operation Phase ESMS
- Occupational Health & Safety Plan
- Lifting Tools & Tackles Report
- Annual Health Check-up Report
- Safety Record Book
- EHS KPIs
- Electrical Inspection Certificate
- Annual Inspection Report of Firefighting & detection equipments
- Fireman & Fire Truck Driver Details
- Emergency Response Plan
- Pest Control License
- Waste Inventory
- ECC of Waste Vendor
- Akota Inspection Report
- GHG Inventory
- CCRA Implementation Status
- Work Permits
- Mock Drill Reports
- Monthly Safety Committee Meeting MoM
- Project Manpower Details
- Labour License of Contractor
- SATCO Appointment Letter
- EKOTA Appointment Letter
- Back Wage Payment Details
- LRP External Monitoring Report

- Final Livelihood Restoration Report
- Courtyard Meeting Minutes
- Declaration of non-interested parties
- Dormitory Building Residence Details
- Grievance Summary Details

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