

Environmental and Social Action Plan (ESAP) – Belgrade Airport (#41123)

| # | Actions | Milestone |
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| 1. | The Company will establish an overarching E&S policy defining the environmental and social objectives and principles for ANT. The policy will be consistent with the principles of IFC’s Performance Standards and Vinci Airports’ E&S policy. The company will communicate the policy to all levels of airport organization. | March 15, 2019 |
| 2. | The Company will commission a social baseline study focused on ANT direct area of influence and developed in accordance with PS1. | April 30, 2019 |
| 3. | The Company will perform the identification of E&S risks and impacts of the CA mandatory works program in accordance with Serbian regulatory requirements and IFC’s Performance Standards. | 1) November 2019 2) December 2019 (60 days before construction works commence for the relevant CA mandatory works program component) |
| 4. | The Company will require the project EPC contractor to develop a Construction ESMP comprising all environmental, social, health and safety performance requirements and detailed timelines for implementation of specific mitigation measures and monitoring activities. The Construction ESMP will define responsibilities, include subcontractor managements, and as a minimum will comprise the following plans: <ul style="list-style-type: none"> • Subcontractors management plan; • Air emissions and dust management; • Waste management (covering hazardous and non-hazardous waste streams); • Oil and chemical spill management; • Traffic and transport management; • Occupational health and safety management; • Emergency preparedness and response; • Community health and safety management; • Security management; • Grievance procedure (external for affected parties); • Noise and vibration management; • Chance find procedure; • Environmental monitoring | 30 days prior /construction commencement for any of CA mandatory works program component. |

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| 5. | The Company will review ANT management systems in place and upgrade them consistent with ISO 14001: 2015 and ISO 45001: 2018. The upgraded management systems will include an operational ESMP which will be defined and developed based on the results of the E&S assessments and will ensure compliance with IFC’s Performance Standards. The operational ESMP will include, among others, all required environmental monitoring programs for airport operations. | October 2019 |
| 6. | The Company will (i) perform an analysis of the existing ANT E&S organizational capacity and (ii) based on outcomes upgrade E&S organizational structure. The company will employ an E&S manager with experience in the application of the E&S standards of international financial institutions to ensure implementation of the project’s E&S management system for the construction and operation phase, according to IFC’s PS. | (a) June 2019 (b) March 2019 |
| 7 | The Company will: (i) update OHS risk assessment and procedures for all working positions; (ii) update OHS training program; (iii) update work-related accident repose plan; and (iv) update work-related injury recording procedure to monitor and improve ANT OHS performance. | June 2019 |
| 8. | The Company will conduct an energy efficiency audit for ANT and based on outcomes define and implement cost-effective energy consumption reduction measures. | December 2020 |
| 9. | The Company will: (i) design and construct a wastewater treatment plant for treatment of sanitary wastewaters with the capacity of 681 m3/day; (ii) install a containment pond for storm water; (iii) install oil-water separators to treat storm water runoff from areas with potential for hydrocarbon spills; and (iv) install a containment pond for the collection and proper treatment of wastewater from the de-icing platform. | December 2024 |
| 10. | The Company will: <ul style="list-style-type: none"> • establish 24/7 noise and flight track monitoring at ANT, and • develop a noise mitigation plan for ANT based on the adoption of a Balanced Approach required by EU Directive 2002/30/EC The noise / flight track monitoring system and the noise mitigation plan will be integral part of the operational ESMP. | December 2019 June 2019 |
| 11. | The Company will actively promote the establishment of ANT Environmental Advisory Committee (EAC) among the public and private sector stakeholders. | June 2019 |
| 12. | The Company will improve solid waste management at ANT by: (i) construction of a waste sorting building, (ii) construction of two non-hazardous waste storage areas, (iii) construction of a hazardous waste storage area, and (iv) upgrade of the ANT waste management plan in line with the local legal requirements and WBG EHS general and sector guidelines. | December 2022 |

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| 13. | The Company will perform Phase II ESA in accordance with ASTM E1903 to provide information on the site environmental conditions. Based on ESA outcomes the Company will prepare and implement required decontamination activities in accordance with Serbian legal requirements. | December 15, 2018 November 20, 2020 |
| 14. | The Company will perform an assessment of the current use and management of pesticides, herbicides and agricultural chemicals and based on outcomes develop and implement an integrated plan for the management of the grassed areas. | October 2019 |
| 15. | The Company will proactively engage and collaborate with the responsible Serbian authorities to: (i) calculate risk and identify a quantifiable risk contour off the ends of ANT runway based on runway use statistics correlated against international crash data, (ii) identify and establish ANT public safety zones, provides an objective basis for precautionary planning decisions in those areas of highest risk and (iii) reflect established ANT public safety zones in the land use planning and zoning of the airport plans. | At the approval by the relevant authorities of the public safety zones |
| 16. | The Company will review and update the emergency response procedures, to ensure that they meet national requirements and IFC's Performance Standards, as per ESAP item #17. The procedure will also address natural disasters (earthquake, inclement weather etc.) in accordance with the Emergency Situations Law. | December 2018 |
| 17. | The Company will implement L&FS corrective actions that were identified by L&FS Due Diligence performed by MARSH&SGS in June,2018. | March 2019 October 2021 |
| 18. | The Company will develop a Life and Fire Safety Master Plan for new ANT terminal building in accordance with internationally accepted life and fire safety (L&FS) standard as required by the relevant section of WBG General EHS Guidelines. Vinci will engage a third party L&FS specialized consultant acceptable to IFC to approve compliance of the L&FS master plan with local and international L&FS standards. | 60 days before construction of ANT terminal building commence. |
| 19. | The Company will revise the draft Land Acquisition and Compensation Framework to IFC's satisfaction. | Prior to the commissioning of the project. |
| 20. | The Company will engage with the Government and collaborate to understand the details of land acquisition process to be implemented by the GoS as per the CA obligations. The Company will undertake a comprehensive socio-economic assessment of land to be acquired for the concession. Based on the results of the socio- | 60 days prior GoS initiate land acquisition process. |

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| | <p>economic assessment, the company will define and implement a Land Acquisition and Compensation Plan addressing the following aspects:</p> <ul style="list-style-type: none">• Cooperation with responsible Government agencies to ensure compensation for land take at replacement cost (i.e. at market value of land plus the transaction cost incurred in buying similar land). In case compensation provided is below replacement cost of land, measures to bridge gaps are to be identified and implemented.• Ensure that affected land owners, tenants and customary land/resource users are appropriately identified, informed and consulted throughout the process.• Ensure that due compensation is paid before entering the land or before imposing any restriction to land owners in using the properties.• Ensure provision of assistance for restoring the livelihoods of affected people, to the extent that livelihoods are affected.• Ensure that vulnerable landowners, tenants and customary land/resource users (if any) are appropriately consulted and informed of their rights throughout the land acquisition process and any measures to ensure they are not disadvantaged are implemented. | |
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