

BAKU METRO EXPANSION PROJECT GREEN LINE

E S I A NVIRONMENTAL OCIAL MPACT SSESSMENT

Draft Environmental and Social Management Plan (ESMP)

Prepared for Baku Metropolitan Closed JSC

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List of Acronyms

AIIB	Asian Infrastructure Investment Bank
AOI	Area of Influence
ATS	Automatic Train Supervision
BCEP	Baku City Executive Power
BOM	Bureau of Meteorology
BTR	Biennial Transparency Report
BTR	First Biennial Transparency Report
CAMP	Construction Accessibility Management Plan
CFPB	Code for Fire Protection of Buildings
CHS	Community Health & Safety
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CJSC	Closed Joint-Stock Company
CLO	Community Liaison Officer
CLRTAP	Convention on Long-Range Transboundary Air Pollution
CMS	Bonn Convention
COP	Climate Change Conference
CSIRO	Commonwealth Scientific and Industrial Research Organisation
E&S	Environment and Social
EHS	Environmental Health and Safety
ESHS	Environment, Social, Health and Safety
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EPB	Earth Pressure Balanced
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
ESF	Environmental and Social Framework
ESHS	Environmental, Social, Health and Safety
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESP	Environmental and Social Policy
ESS	Environmental and Social Standards

EU	European Union
FIRR	Financial Internal Rate of Return
GHG	Greenhouse Gas
GM	Grievance Mechanism
IBC	International Building Codes
ICH	Intangible Cultural Heritage
ICOMOS	International Council on Monuments and Sites
ILO	International Labour Organization
IPCC	Intergovernmental Panel on Climate Change
LAP	Land Acquisition Plan
LNAPL	Light Non-Aqueous Phase Liquids
LOTO	Lock Out Tag Out
MDB	Multilateral Development Bank
MDDT	Ministry of Digital Development and Transport
MES	Ministry of Emergency Situations
NA	Not Available
NATM	New Austrian Tunnelling Method
NDC	Nationally Determined Contributions
NEX	NASA Earth Exchange
NFPA	National Fire Protection Association
O&M	Operational and Maintenance
OUV	Outstanding Universal Value
PAP	Project-affected Persons
PEGAS	Power Energy General Automation System
PIU	Project Implementation Unit
PM	Particular Matter
POM	Project Operations Manuel
PPP	Public–Private Partnership
PWD	Persons with Disabilities
RP	Resettlement Plan
RP	Resettlement Plan
SDG	Sustainable Development Goals

SEE	State Ecological Expertise
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
SPRP	Spill Prevention and Response Plan
SSP	Shared Socioeconomic Pathways
STAT	State Statistical Committee of the Republic of Azerbaijan
TBM	Tunnel Boring Machine
UNCCD	United Nations Convention to Combat Desertification
UNESCO	United Nations Educational, Scientific and Cultural Organization
UNFCCC	United Nations Framework Convention on Climate Change
VOC	Volatile Contaminants
WHO	World Health Organisation

1. INTRODUCTION

1.1 Background

The Government of the Republic of Azerbaijan, through Baku Metropolitan Closed Joint-Stock Company (“Baku Metro” or “BM”), is implementing Phase II of the Baku Metro Expansion Project (“BMEP”), which includes the extension of both the Green Line and the Purple Line within the urban area of Baku.

This Environmental Social Management Plan (ESMP) has been prepared specifically for the Green Line Extension (the Project), which is planned to be financed by the Asian Infrastructure Investment Bank (AIIB), and is being developed in accordance with applicable national legislation and international standards.

The Green Line Extension comprises approximately 7.4 km of fully underground alignment and four new underground stations (Y-14, Y-15, Y-16 and Y-17), extending from Khatai to Hazi Aslanov. The Project is intended to improve east–west connectivity across densely populated residential districts, enhance network resilience, and improve overall operational efficiency. Stations Y-15 and Y-17 include civil structures that were partially constructed during earlier project phases, which will be integrated, upgraded, and completed under the Project.

1.2 Overview and Purpose of the ESMP

This ESMP sets out the mitigation measures management procedures, and monitoring framework required to manage environmental and social (E&S) risks and impacts associated with the Project during both construction and operation. It defines responsibilities, implementation arrangements, and monitoring and reporting requirements.

The ESMP is based on the findings of the ESIA and provides the overall framework for environmental and social management, including a set of preliminary management plans (e.g. traffic management plan, waste management plan, spoil disposal management plan and other topic-specific plans). These management plans establish the minimum requirements and baseline measures to be implemented under the Project. The Contractor shall review, update, and further develop these plans into site-specific, detailed management plans and method statements, taking into account the final design, construction methodologies, work sequencing, and site conditions. In addition, the Contractor shall prepare and implement additional management plans, as required, that are not fully developed within this ESMP (e.g. Air Quality Management Plan, Noise and Vibration Management Plan), in accordance with Project requirements and applicable standards.

The Contractor shall ensure that all updated plans are submitted for review by the Engineer and approval by Baku Metro prior to the commencement of relevant activities and shall implement the approved plans throughout Project execution.

The ESMP follows the mitigation hierarchy, prioritising impact avoidance and, where avoidance is not possible, identifying technically and financially feasible measures to minimise impacts to acceptable levels.

The ESMP will be updated as necessary throughout Project implementation to reflect changes in Project activities, identified risks, and applicable legal or regulatory requirements.

The Project layout is presented in Figure 1. A full description of the Project, including alignment, station configuration, construction methodology and programme, is provided in Chapter 2 (Project Description) of the ESIA.



Figure 1 General layout of Baku metro lines

This ESMP has been developed to comply with AIIB’s Environmental and Social Framework (ESF) 2024 and all national laws as well as international treaties and conventions. A full review of the applicable legal, policy and institutional framework, including a gap analysis against the AIIB ESF requirements is provided in Chapter 4 (Regulatory Framework) of the ESIA. Where a difference exists between national requirements and the AIIB ESF, the more stringent requirement shall apply.

1.3 Scope of the ESMP

The ESMP applies to the construction and operational phases of the Project and to all personnel employed on the Project in accordance with their tasks and responsibilities. This document is an overarching framework for environmental and social management. The Contractor is required to

transpose the measures and principles of this framework document into a Construction ESMP prior to site preparation/construction activities taking place.

1.3.1 Relationship between the Project's Environmental and Social Documents

The Project's environmental and social (E&S) documents are complementary and are to be read together. Each document serves a distinct purpose:

- **ESIA** – assesses the Project's E&S risks and impacts and identifies the mitigation measures required to address them.
- **ESMP** – the operational document, setting out how the mitigation measures identified in the ESIA will be implemented during construction and operation, including institutional arrangements, management plans, monitoring, reporting requirements and implementation budget.
- **ESAP** – a concise, action-oriented commitment document identifying the time-bound actions, responsible parties, implementation deadlines and evidence of completion required to achieve compliance with the AIIB Environmental and Social Framework (2024) and the Project's E&S documents. The ESAP does not reproduce the detailed mitigation measures, specifications or procedures set out in this ESMP; it references them.
- **Contractor ESMS and C-ESMP** – the Contractor's management system and site-specific management plans, which transpose the requirements of this ESMP into the Contractor's organisation, construction methodology and site conditions.
- **Method statements** – activity-specific work instructions prepared by the Contractor for defined high-risk activities.

To avoid duplication, each requirement is set out once in the relevant document and cross-referenced elsewhere. The relationship between the documents is illustrated in Figure 2.

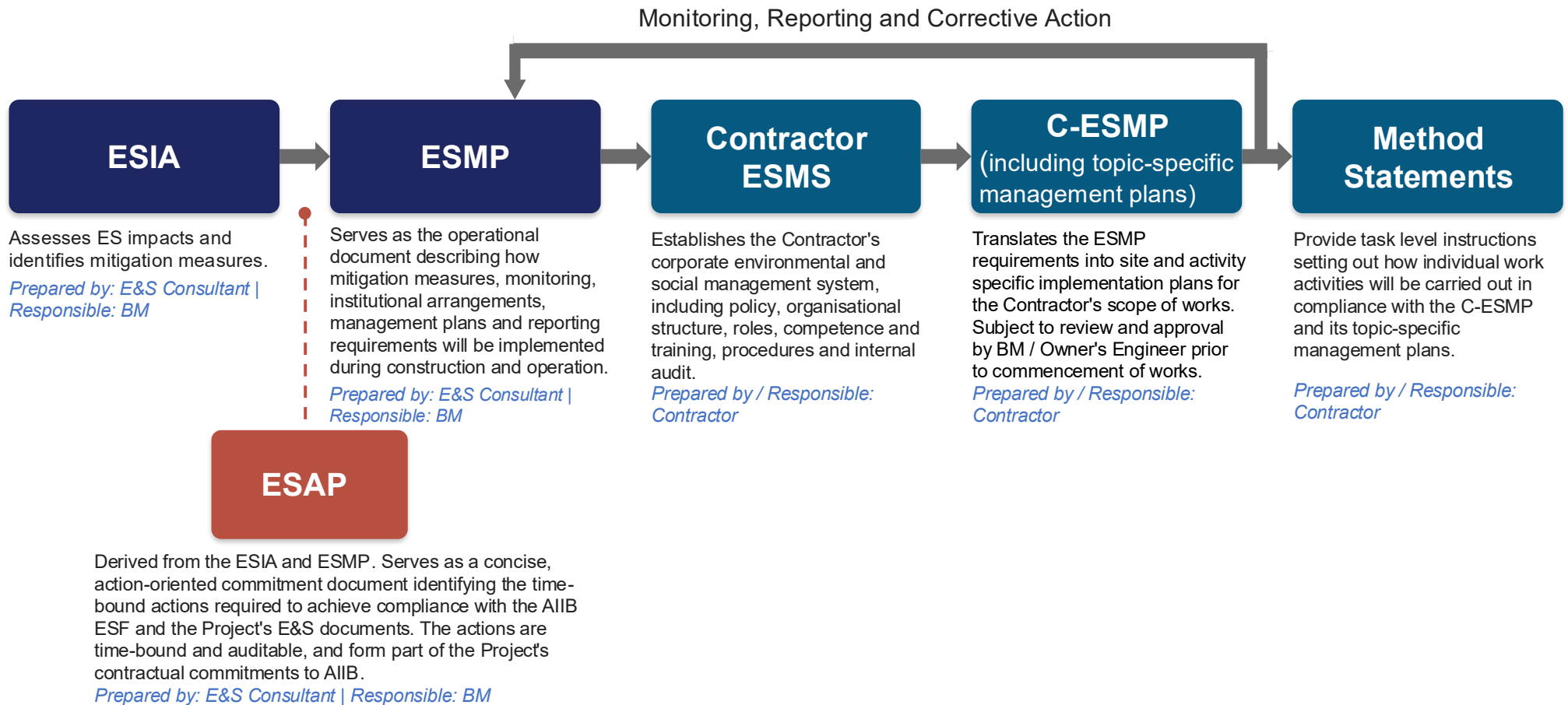


Figure 2 Relationship between the Project's Environmental and Social Management Documents

1.4 Construction ESMP

The Construction Environmental and Social Management Plan (C-ESMP) which is to be prepared by the Contractor will detail control steps necessary to reduce environmental and social impacts through the entire construction phase of the Project, identifying as a minimum:

- Description of the works,
- Regulatory requirements,
- Site organisation and management,
- Roles and responsibilities,
- Review, reporting and auditing procedures,
- Environmental and social risks and impacts,
- Mitigation and protection measures,
- Monitoring requirements,
- Training requirements,
- Emergency response plans and
- Method statements (where applicable).

The development of the C-ESMP will be finalized and will be supported by the following:

- Policies – overarching system of principles to guide the Project's environmental and social performance,
- Plans – additional, more detailed plans prepared by contractors related to specific aspects and areas which are impacted by their scope of works (i.e. construction environmental and social management plan including risk analysis) and
- Procedures – more specific work instructions developed by the Contractor, in collaboration with BM, to support the implementation of the plans.

BM is responsible for oversight of the Contractor during the construction phase. BM is also responsible for ensuring the Project complies with mitigation measures outlined within this document for the operational phase.

1.5 Structure of the ESMP

Structure of this document is given below:

Section 2 outlines the institutional arrangements through which the ESMP is implemented and the relationship and responsibilities between BM and Contractor. Where relevant, a number of capacity building measures have been identified to ensure that the institutional arrangements are appropriate and qualified for the allocated tasks.

Section 3 introduces the training requirements for the Project to ensure the right capability and capacity of the staff and organisations involved. It also outlines how to ensure the training is appropriate and records are effectively kept on which staff have received which training.

Section 4 provides an outline on the various site-specific E&S management and monitoring plans to be implemented as part of the ESMP by BM and Contractor. The subplans are intended to ensure that the various mitigation measures / activities identified through the ESIA process are incorporated by the project in a structured way.

Section 5 gives an overview of monitoring and reporting requirements associated with the activities and commitments contained within the ESMP documentation. The monitoring and reporting requirements include an adaptive management capacity to the ESMP reflecting that it is intended to be a live document subject to regular review and update as the Project evolves.

Section 6 sets out the arrangements for emergency preparedness and response and for the management of incidents and accidents. It defines the emergency organisation, responsibilities, communication procedures, coordination with the external emergency services, evacuation and rescue arrangements, drills and post-event review, together with the classification, notification, investigation, root cause analysis, corrective action, reporting and record keeping requirements applicable to incidents. These arrangements apply to both occupational and community emergencies, on the basis that credible worst-case scenarios affect workers and the public simultaneously.

Appendix A consolidates the deliverables required under this ESMP into a single checklist, identifying the responsible party and the implementation milestone for each deliverable.

2. IMPLEMENTATION OF THE ESMP

2.1 Overview

BM (the owner of the Project) and the Contractor (the lead organisation employed to construct the Project) are the key stakeholders involved in the construction and operation phases of the Project. BM has overall accountability for the implementation of the mitigation measures outlined in this ESMP. BM will also appoint an Engineer (Owner's Engineer) with an open tender process. The Owner's Engineer will provide consultancy services to BM to monitor the Contractor's activities as per the national legislation and AIIB E&S requirements during construction stage of the Project. The Contractor is required to transpose the measures and principles of this framework document into the C-ESMP for construction phase of the Project, and BM is required to transpose the measures and principles of this framework document into the ESMP which will include the operational phase of the Project. Further detail on the management plans and associated mitigation measures that the different organisations will develop and be responsible for implementing is provided in Section 4 of this document.

2.2 Roles and Responsibilities

This section outlines the roles and responsibilities for BM, Owner's Engineer and Contractor.

The overall responsibility for the establishment, implementation, maintenance and effectiveness of ESMP will lie with BM, supported by the Owner's Engineer. For this purpose, necessary human and financial resources and technical infrastructure will be provided for all phases of the Project.

Prior to start of the construction, BM and Owner's Engineer will establish an organizational structure for the implementation of the ESHS and relevant personnel, especially those who have critical importance in the implementation and management of the ESHS (i.e. management representatives) will be appointed. Key environmental and social roles, responsibilities and authorities as well as qualifications will be clearly defined and announced to the relevant responsible personnel and to the rest of the employees working within the Project.

Personnel with direct responsibility for the Project's environmental and social performance such as health and safety specialist, environmental expert, social expert and other members will be adequately qualified, trained and experienced to perform their work. Competencies of these employees will be met with national legal requirements and AIIB's expectations. External experts and/or consultancy services, if legally or technically necessary, will also be obtained during the Project phases. Determination and providing of the training needs, informing and increasing the awareness of the employees, subcontractors and suppliers regarding the Environmental, Social, Health and Safety (ESHS) Policy; significant environmental and social risks and impacts; and procedures will be defined.

BM will appoint an Environmental and Social Manager having overall responsibility for the establishment, implementation and maintenance of the ESMS.

2.2.1 Institutional Capacity

An assessment of BM's environmental and social management capacity, covering its existing management systems, organisational structure, E&S resources and identified capacity gaps, is presented in Chapter 7 (Environmental and Social Capacity Assessment of Baku Metropolitan) of the ESIA. In summary, BM does not currently operate a formal environmental or occupational health and safety management system, responsibility for E&S compliance remains dispersed across several corporate departments, and a number of the labour, OHS, grievance and subcontractor management procedures required under the AIIB ESF are either under preparation or not yet established.

To address these gaps at Project level, a dedicated Project Implementation Unit (PIU) ESHS team will be established within BM. The corporate-level strengthening measures including development of an ESHS management system aligned with ISO 14001 and ISO 45001, a corporate E&S policy, an ES permit register, and the associated resourcing, training and system requirements are set out in Section 4, Table 9 together with the responsible parties and implementation deadlines, and are committed under the corresponding actions of the ESAP.

Minimum qualifications for each ESHS positions are given in Table 2, Table 3 and Table 4.

2.2.2 Responsibility Assignment (RACI) Matrix

The RACI Matrix is a management tool used to clarify responsibilities in projects or organizations. The RACI Matrix presented in Table 1, clarifies who has Responsibility, who has Accountability, who is Supporting, who is Reviewing/Verifying and who is Approving for principal activities.

A – Accountable: the party holding overall accountability for the outcome of the activity, including for the performance of others carrying it out. Only one party is Accountable for each activity.

R – Responsible: the party that carries out the activity and produces the required output.

S – Supporting: the party that provides input, resources, information or access required for the activity, without being responsible for its delivery.

V – Reviewing / Verifying: the party that independently reviews the output or verifies that the activity has been carried out as required, and reports its findings.

Ap – Approving: the party that formally approves the output before it takes effect or before the associated works may proceed.

Where more than one code is shown against a party, that party performs each of the indicated functions for the activity concerned.

The Contractor and BM shall expand this matrix to individual post level within the Contractor's ESMS and the Project ESMS respectively, without altering the assignments set out below. The matrix shall be approved by Baku Metro and agreed with all stakeholders.

Table 1 Responsibility Assignment Matrix

Activity	BM (PIU)	Owner's Engineer	Contractor
Compliance with national legislation, permits, NOCs and approvals	A, R	V	R
Ensuring that design and planning comply with national requirements and are aligned with international good practice	A, Ap	V, R	S
Preparation and approval of management plans and method statements	A, Ap	V	R
Implementation of the mitigation measures set out in this ESMP	A	V	R
Environmental and social monitoring	A	V	R
Monitoring the performance of contractors and subcontractors providing workforce, supplies and services	A	R, V	R
Periodic environmental and social reporting	A, Ap	V	R
Incident and accident notification, investigation and root cause analysis	A, Ap	V	R
Stakeholder engagement, information disclosure and grievance management	A, R	V	S
Issuance of non-conformances and close-out of corrective actions	A	R, Ap	S
Training of workers on E&S topics and implementation of this ESMP	A	V	R
Implementation of the Resettlement Action Plan, including compensation delivery and completion audit	A, R	V	S
A – Accountable R – Responsible S – Supporting V – Reviewing/Verifying Ap – Approving			

2.2.3 Reporting Lines

The Contractor reports to the Owner's Engineer on all matters relating to the execution of the works, including environmental and social performance. The Contractor submits monthly E&S monitoring reports to BM and the Owner's Engineer not later than seven days after the end of each month, and notifies the Owner's Engineer and BM of all incidents.

The Owner's Engineer is an independent third party contracted by BM and does not form part of the BM PIU. The Owner's Engineer supervises the Contractor's compliance with its contractual E&S obligations, independently verifies the Contractor's monitoring data, issues non-conformances and reports its findings to the BM PIU ESHS Manager.

The BM PIU ESHS Manager retains overall accountability for Project E&S performance, consolidates E&S monitoring and reporting, and escalates Project E&S risks to the corporate risk register maintained by the Risk and Quality Management Department. BM submits quarterly progress reports to AIIB not later than 15 days after the end of each quarter and notifies AIIB of fatal and high-potential (Level 4)

incidents through a flash report within 24 hours, a detailed incident report within 72 hours and a root cause analysis report within seven days of the incident.

Subcontractors report to the Contractor, which remains responsible to BM and the Owner's Engineer for the E&S performance of its entire supply chain.

2.3 Management of Environmental, Social, Health and Safety

In order to meet the organisational roles and responsibilities outlined above, each organisation will ensure effective staffing structures and roles in place to manage ESHS issues and risks for both the construction and operational phases. This section outlines the structures and roles for construction and operation phases.

2.3.1 Construction Phase

BM has the overall responsibility for the implementation of ESHS for the construction. On the other hand, during this phase Contractor is required to adhere to Project standards that is in line with AIIB requirements and national legislative framework.

- Before the construction activities start, BM and Owner's Engineer will develop an ESHS team to both manage the overall compliance of the Project and oversee the compliance of Contractor and its subcontractors.
- Contractor will cascade down the AIIB and ILO requirements to its subcontractors and suppliers.
- Owner's Engineer will engage a labour expert (if not available in house, then a third-party consultant) accredited by International Standards to conduct regular (quarterly) labour audits (including accommodation camp conditions) and address audit findings annually to ensure contractors' compliance with labor law and ESS1 – Labour Management requirements during construction. Contractor, on the other hand, has to provide all documentation requested by BM and Owner's Engineer including Contractor's subcontractors.
- Contractor through its Health and Safety experts is responsible for monitoring worker accommodation sites and assuring that they are in line with IFC/EBRD Guidance on Worker Accommodation.
- Contractor through its HR Manager is responsible for monitoring labour performance of all its subcontractors.
- CLO of the Contractor is responsible for monthly reporting of internal grievances to BM.
- BM and Owner's Engineer ESHS team are responsible for quarterly internal monitoring of the Project's environmental and social performance. This may partially or totally be delegated to third party consultants. The monitoring will:

- Assess the ESHS performance of the contractor
- Provide a snag list with risk register and improvement actions

2.3.1.1 Contractor

The Contractor is required to establish and implement Environmental and Social Management System (ESMS) in line with internationally recognized standards, such as ISO 14001:2015 and ISO 45001:2018, or equivalent. The systems shall cover all construction activities and subcontractors involved in the Project.

These standards place strong emphasis on the need for continuous improvement of the ESMS and resultant ESHS management performance.

The Contractor will take the following actions:

- Provide a construction site layout plan that identifies key activity areas in line with the relevant requirements.
- Develop a project specific C-ESMP.
- Review, update, and further develop management plans (e.g. traffic management plan, waste management plan, spoil disposal management plan and other topic-specific plans) included in the ESMP package into site-specific, detailed management plans,
- Develop other management plans (e.g. Air Quality Management Plan, Noise and Vibration Management Plan etc).
- Produce detailed method statements relating to key activities that include specific reference to requirements of the plans contained herein during the project progression
- Identify a person to be on site with dedicated ESHS responsibilities to oversee works on site. This person must be full time, appropriately qualified, and have more than ten years of relevant experience. The international ESHS manager will be supported by an ESHS team.
- Provide all training necessary to oversee and implement ESMP requirements prior to and throughout construction as appropriate.
- Be responsible for producing a comprehensive suite of ESHS management and coordination procedures.
- Implement the requirements of the mitigation activities in the C-ESMP.
- Undertake environmental and social monitoring as specified in this ESMP.
- Appoint HR Manager to manage and monthly report on labour grievances and labour performance monitoring, including all sub-contractors

- Report regularly to BM and Owner's Engineer on any significant environmental social occupational health and safety incidents, as they occur during the construction and take appropriate corrective actions
- Ensure the medical facility / first aid office and medics are available for the construction workforce
- Appoint the CLO to interact with the local communities and receive, register, investigate, manage and monthly report on any community grievances received during the construction period under coordination of BM's CLO.

All contractor staff is responsible for ESHS management in their specific role. The main responsibility of dedicated ESHS staff is to focus on the monitoring of and reporting on C-ESMP and ESMS commitments and improvements, and any additional plans outside the work of construction site staff.

The Contractor is responsible for construction contractor performance, including contractor adherence to the requirements of the C-ESMP. Contractor is required to have dedicated environmental and social staff to implement the ESHS Management plan and to monitor and manage this on an on-going basis. Contractor ESHS team for the Project is set out in Figure 3 and Table 2.

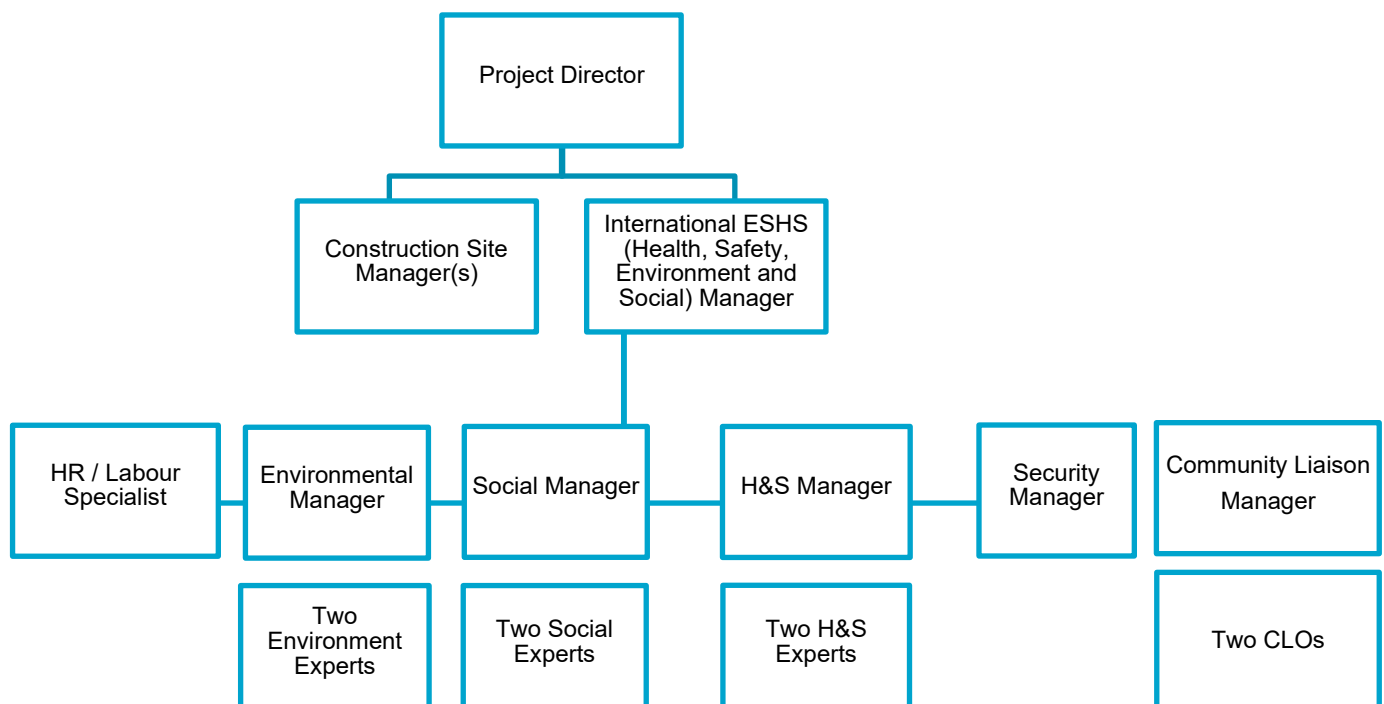


Figure 3 Contractor ESHS Team

Table 2 Typical Contractor ESHS staffing

Role	Responsibility	Typical number of staff in role (depending on scale of works)	Qualification Requirements
Project Director	Overall responsibility for the entire works contract, including ESHS performance of contracted works, including subcontractor(s).	1	Education: B.Sc. degree in engineering or equivalent. General Experience: Minimum 15 years of professional experience in major infrastructure construction. Specific Experience: Minimum 10 years in a senior management role on underground, tunnelling or metro construction projects; demonstrated accountability for the ESHS performance of works contracts, including subcontractors. Language Skills: Fluent in English; knowledge of Azerbaijani will be considered an asset.
Construction Site Manager	Coordination of all construction activities, including practical implementation of ESHS requirements at site and onsite ESHS performance.	1	Education: B.Sc. degree in civil engineering or equivalent. General Experience: Minimum 15 years of professional experience. Specific Experience: Minimum 10 years in site management of heavy civil works, of which at least 5 years on metro, tunnelling or underground projects; valid national OHS certification. Language Skills: Fluent in English; Azerbaijani

Role	Responsibility	Typical number of staff in role (depending on scale of works)	Qualification Requirements
ESHS Manager	Monitoring and reporting of Project ESHS performance. ESHS regulatory interface. Management and monitoring of ESHS management plans implementation and environmental issues and performance Managing the team Reporting to the site manager Organising training for staff, including induction training (liaising with Environmental and Social Officers for delivering training) Ensuring project has the right environmental and social permits, consents, and discharge conditions to undertake the works Liaise with HR teams to ensure workers have the appropriate facilities, contracts, permits, qualifications and capacity for their work.	1	Education: B.Sc. degree in environment or similar General Experience: Minimum 15 years of professional experience. Specific Experience: • Minimum 10 years' experience in environmental, social, health and safety studies, ESIA and ESDD in projects of a similar nature; • Specific experience in ESHS management • Proven practical knowledge of the AIIB Environmental and Social Framework and past experience of assistance in their successful implementation or those of other IFIs. Language Skills: Fluent in English; and Knowledge of the local language will be considered an asset.
Environmental Manager	Responsible for the implementation and supervision of environmental management measures at the site, ensuring compliance with environmental legislation, project requirements, and the ESMP. Coordinates environmental monitoring, reporting, and corrective actions.	1	Education: B.Sc. degree in environment or similar General Experience: Minimum 15 years of professional experience. Specific Experience: • Minimum 10 years' experience in environmental management, ESIA and ESMP implementation on construction projects of a similar nature; • Specific experience in environmental requirements according to local law

Role	Responsibility	Typical number of staff in role (depending on scale of works)	Qualification Requirements
			Proven practical knowledge of the AIIB Environmental and Social Framework and past experience of assistance in their successful implementation or those of other IFIs. Language Skills: Fluent in English; and Azerbaijani
Social Manager	Responsible for the implementation and supervision of social management measures at the site, ensuring compliance with environmental legislation, project requirements, and the ESMP. Coordinates environmental monitoring, reporting, and corrective actions.	1	Education: B.Sc. degree in social sciences (or equivalent qualification) in relevant sector. General Experience: Minimum 15 years of professional experience. Specific Experience: - Minimum 10 years' experience in social management on construction projects of a similar nature, including stakeholder engagement, grievance mechanism operation, labour and working conditions, and GBVH risk management; - Practical knowledge and understanding of AIIB's Environmental and Social Framework and past experience of assistance in their successful implementation or those of other IFIs. - Experience of working as Gender Specialist would be considered an advantage Language Skills: Fluent in English; and Azerbaijani

Role	Responsibility	Typical number of staff in role (depending on scale of works)	Qualification Requirements
H&S Manager	Responsible for the implementation and oversight of occupational health and safety requirements on site, ensuring compliance with applicable regulations and project OHS procedures. Supervises safety performance, incident management, and safety reporting.	1	Education: B.Sc. degree (or equivalent qualification) in engineering or occupational health and safety. General Experience: Minimum 15 years of professional experience. Specific Experience: • Minimum 10 years' general experience as a Health and Safety Manager on projects of a similar nature, including underground or heavy civil works • Specific experience in Health and safety according to Azerbaijani laws; • Practical knowledge and understanding of AIIB's Environmental and Social Framework and past working experience of assistance in their successful implementation or those of other IFIs. Language Skills: Fluent in English; and Azerbaijani
Environmental Experts	Support the Environmental Manager on works; Monitoring and enforcement of ESHS management plans implementation and environmental issues and performance Auditing of site activities and any sub-contractor activities, including permitting and consent requirements or any conditions	2 x Environmental experts may vary depending on level of activity.	Education: B.Sc. degree in environment or similar General Experience: Minimum 12 years of professional experience. Specific Experience:

Role	Responsibility	Typical number of staff in role (depending on scale of works)	Qualification Requirements
			- Minimum 8 years' experience in environmental studies, ESIA and ESDD in projects of a similar nature; - Specific experience in environmental requirements according to local law - Proven practical knowledge of the AIIB Environmental and Social Framework and past experience of assistance in their successful implementation or those of other IFIs. Language Skills: Fluent in English; and Azerbaijani
Social Experts	Support the Social Manager on works; Monitoring and enforcement of ESHS management plans implementation and social issues and performance Auditing of site activities and any sub-contractor activities, including permitting and consent requirements or any conditions	2 x Social experts may vary depending on level of activity.	Education: B.Sc. degree in social sciences (or equivalent qualification) in relevant sector. General Experience: Minimum 12 years of professional experience. Specific Experience: - Minimum 8 years' general experience as Social Specialist in projects of a similar nature; - Practical knowledge and understanding of AIIB's Environmental and Social Framework and past experience of assistance in their successful implementation or those of other IFIs. - Experience of working as Gender Specialist would be considered an advantage Language Skills: Fluent in English; and Azerbaijani

Role	Responsibility	Typical number of staff in role (depending on scale of works)	Qualification Requirements
H&S Experts	Support the H&S Manager on H&S Manager on works; Monitoring of ESHS implementation and reporting health and safety issues to the H&S Manager Delivering training as required including “toolbox talks”. OHS expert will support the HSE team with ensuring high standards of health and safety on site, monitoring of health and safety, and providing training, amongst other duties.	2x H&S expert may vary depending on level of activity.	Education: B.Sc. degree (or equivalent qualification) in relevant sector. General Experience: Minimum 12 years of professional experience. Specific Experience: • Minimum 8 years’ general experience as Health and Safety Specialist in projects of a similar nature; • Specific experience in safety of construction, audit and inspection for construction of metro projects. • Specific experience in Health and safety according to Azerbaijani laws; • Practical knowledge and understanding of AIIB’s Environmental and Social Framework and past working experience of assistance in their successful implementation or those of other IFIs. Language Skills: Fluent in English; and Azerbaijani
Security Manager	Ensures third parties do not access construction site	1	Education: B.Sc. degree (or equivalent qualification) in a relevant sector. General Experience: Minimum 12 years of professional experience.

Role	Responsibility	Typical number of staff in role (depending on scale of works)	Qualification Requirements
			Specific Experience: Minimum 8 years' experience in security management on industrial or construction sites; demonstrated knowledge of the Voluntary Principles on Security and Human Rights and of unarmed security and use-of-force protocols. Language Skills: Fluent in Azerbaijani; working proficiency in English.
Community Liaison Manager	Responsible for community liaison and arranging communications with project affected communities during construction under supervision and direction of the CLO of BM Maintaining coordination with CLO of BM in delivery of SEP and CAP Responsible for receiving, channelling and managing resolution of community grievances during construction in line with SEP. All complaints will be recorded and reported within project reporting to Lenders. Responsible for regular community grievance reporting	1	Education: B.Sc. degree (or equivalent qualification) in relevant sector. General Experience: Minimum 15 years of professional experience. Specific Experience: • Minimum 10 years' general experience as CLO in projects of a similar nature; • Practical knowledge and understanding of AIIB's Environmental and Social Framework and past experience of assistance in their successful implementation or those of other IFIs. Language Skills: Fluent in English; and Knowledge of the local language will be considered an asset.
Community Liaison Officers	Support the Community Liaison Manager in implementing stakeholder engagement activities in accordance with the SEP. Assist in maintaining regular communication with project-affected communities, facilitating information sharing, and supporting the	2 (at least one female)	Education: B.Sc. degree (or equivalent qualification) in relevant sector.

Role	Responsibility	Typical number of staff in role (depending on scale of works)	Qualification Requirements
	management and documentation of community grievances during construction.		General Experience: Minimum 12 years of professional experience. Specific Experience: • Minimum 8 years' general experience as CLO in projects of a similar nature; • Practical knowledge and understanding of AIIB's Environmental and Social Framework and past experience of assistance in their successful implementation or those of other IFIs. Language Skills: Fluent in English; and Azerbaijani
HR / Labour Specialist	Ensures workers have the appropriate facilities, contracts, permits, qualifications and capacity for their work.	1	Education: B.Sc. degree in human resources, law or social sciences. General Experience: Minimum 12 years of professional experience. Specific Experience: • Minimum 8 years' experience in labour management on construction projects, including subcontractor workforce; • Experience in labour audits and worker grievance mechanisms. • Demonstrated knowledge of the Labour Code of the Republic of Azerbaijan and the ILO core conventions;

Role	Responsibility	Typical number of staff in role (depending on scale of works)	Qualification Requirements
			Practical knowledge and understanding of AIIB's Environmental and Social Framework and past experience of assistance in their successful implementation or those of other IFIs. Language Skills: Fluent in Azerbaijani; working proficiency in English.

2.3.1.2 BM and Owner's Engineer

The Client, BM, and Owner's Engineer have overall accountability for the construction phase and the management of ESMS. As part of this, BM and Owner's Engineer are accountable for the oversight of the Contractor for their performance and that of all contractors on a regular basis. This will include the Contractor's responsibilities with regards to the ESHS management plan and environmental and social management, in accordance with international best practice. This oversight may be implemented through drawing on the services of independent specialists as required.

BM will therefore undertake the following throughout the duration of the construction period:

- Review contractor documents (for example, associated sub-management plans, procedures, and mechanisms for reporting, record keeping and auditing) against the requirements of this ESMP;
- Undertake regular audits;
- Continuously check records to allow for the identification of patterns;
- Set up a contractor reporting structure; and
- Conduct regular meetings where ESHS issues are an agenda item.
- Ensure that community liaison and grievances are managed in line with SEP, grievance management identified in SEP, that all complaints are captured and recorded and reported. CLO of the BM will manage this and supervise relevant staff of Contractor.

BM will include detailed requirements in the Contractors' contracts and agreements, including provisions to incentivise adherence to these requirements such as withheld payments in cases of poor environmental and social performance or additional payments for excellent performance. BM will closely monitor all reports received from the Contractors to monitor compliance. BM's ESHS team for construction and operation stages of the Project is set out in Figure 4.

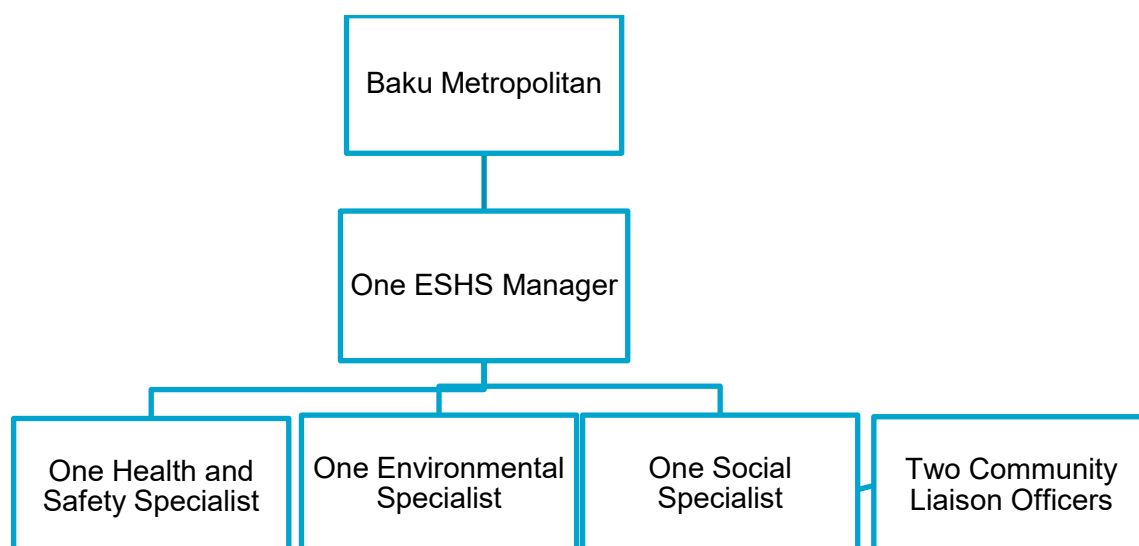


Figure 4 BM's ESHS team

BM personnel key roles and responsibilities are shown in Table 3. This table will be detailed in procedures created as part of the ESMS, including organizational and individual working procedures.

Table 3 BM PIU ESHS Department – Key Roles and Responsibilities

Role	Responsibility	Location	Qualification Requirements
ESHS Manager	Compliance reporting on all ESHS issues to the Head of Department	On site	Education: B.Sc. degree in environment or similar General Experience: Minimum 15 years of professional experience. Specific Experience: - Minimum 10 years' experience in environmental, social, health and safety studies, ESIA and ESDD in projects of a similar nature; - Specific experience in ESHS management - Proven practical knowledge of the AIB Environmental and Social Framework and past experience of assistance in their successful implementation or those of other IFIs. Language Skills: Fluent in English; and Azerbaijani
Environmental Specialist	Compliance and reporting day-to-day	On site	Education: B.Sc. degree in environment or similar

Role	Responsibility	Location	Qualification Requirements
	oversight of environmental issues		General Experience: Minimum 15 years of professional experience. Specific Experience: • Minimum 10 years' experience in environmental studies, ESIA and ESDD in projects of a similar nature; • Specific experience in environmental requirements according to local law Language Skills: Fluent in English; and Azerbaijani
Social Specialist	Compliance reporting and day-to-day oversight of social and labour-related issues	On site	Education: B.Sc. degree (or equivalent qualification) in relevant sector. General Experience: Minimum 15 years of professional experience. Specific Experience: • Minimum 10 years' general experience as Social Specialist in projects of a similar nature; • Practical knowledge and understanding of AIIB's Environmental and Social Framework and past experience of assistance in their successful implementation or those of other IFIs. • Experience of working as Gender Specialist would be considered an advantage Language Skills: Fluent in English; and Azerbaijani
Health and Safety Specialist	Compliance reporting and day-to-day oversight of health and safety issues	On site	Education: B.Sc. degree (or equivalent qualification) in relevant sector. General Experience: Minimum 15 years of professional experience. Specific Experience: • Minimum 10 years' general experience as Health and Safety Specialist in projects of a similar nature; • Specific experience in safety of construction, audit and inspection for construction of metro projects. • Specific experience in Health and safety according to Azerbaijani laws; • Practical knowledge and understanding of AIIB's Environmental and Social Framework and past working experience of assistance in their successful implementation or those of other IFIs.

Role	Responsibility	Location	Qualification Requirements
			Language Skills: Fluent in English; and Azerbaijani
Community Liaison Officer	Day-to-day interaction with all people affected by the Project.	On site	Education: B.Sc. degree (or equivalent qualification) in relevant sector. General Experience: Minimum 15 years of professional experience. Specific Experience: - Minimum 10 years' general experience as CLO in projects of a similar nature; - Practical knowledge and understanding of AIIB's Environmental and Social Framework and past experience of assistance in their successful implementation or those of other IFIs. Language Skills: Fluent in English; and Azerbaijani

The Owner's Engineer will undertake the following tasks during construction and commissioning:

- Assign ESHS resources in their monitoring team (at minimum this shall involve two environmental expert, two social experts, one H&S manager and two H&S experts, one labor expert),
- Assess the capacity of contractors to manage ESHS risks and impacts regularly at site,
- Develop an ESHS monitoring plan and monitor ESHS issues in line with the agreed KPIs through site inspections, document controls, and observations. This monitoring plan shall be approved by the PIU and the Bank,
- Develop records on ESHS inspections undertaken at construction sites,
- Provide training to ESHS resources of the Contractor and their subcontractors, as required,
- Environmental and Social monitoring will include at a minimum:
 - Monitoring dust generations,
 - Monitoring noise and vibration,
 - Monitoring settlements and its impacts on the existing buildings,
 - Monitoring stormwater and wastewater management,
 - Monitoring waste management,
 - Monitoring hazardous material management,
 - Monitoring of biodiversity impacts.
 - Monitoring of labour and working conditions (including subcontractors' workforce) to national law and ESS 1, and worker grievance management,

- Monitoring of forced/child labour and OHS risks in core suppliers,
- Monitoring of gender/gender-based violence and harassment (GBVH) risks during construction both within workers and in communities,
- Monitoring of resettlement/livelihood impacts, and compliance of potential temporary/permanent resettlement of households with ESS 1,
- Monitoring of impacts on local business,
- Monitoring of OHS and community safety risks,
- Monitoring of cultural heritage impacts,
- Monitoring of stakeholder engagement activities, including consultation meetings with affected people with a specific focus on vulnerable people/businesses, local authorities and CLOs,
- Monitoring of external complaints management and reporting on these issues on a regular basis, and
- Verify the implementation of climate-resilient design measures and monitor climate-related performance as defined in Climate Risk and Vulnerability Assessment (CRVA).

Owner's Engineer ESHS team that could be expected for construction and operation stages of the Project is set out in Figure 5 and

Table 4.

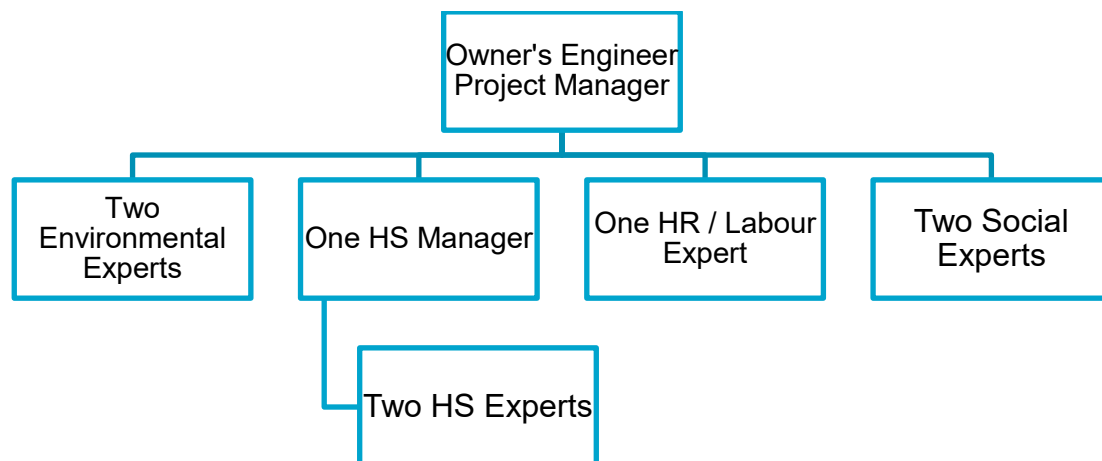


Figure 5 Owner's Engineer ESHS Team

Table 4 Owner's Engineer ESHS Team – Key Roles And Responsibilities

Role	Responsibility	Location	Qualification Requirements
Owner's Engineer Project Manager	Policy, overall responsibility	On site	Education: - B.Sc. degree in environment or similar General Experience: - Minimum 15 years of professional experience. Specific Experience: - Minimum 10 years' experience in construction supervision on projects of a similar nature, including metro or underground works; demonstrated experience acting as the Engineer under FIDIC or equivalent contract conditions - Proven practical knowledge of the AIB Environmental and Social Framework and past experience of assistance in their successful implementation or those of other IFIs. Language Skills: Fluent in English; and Azerbaijani
Environmental Experts	Compliance reporting and day-to-day oversight of environmental issues	On site	Education: B.Sc. degree in environment or similar General Experience: Minimum 15 years of professional experience. Specific Experience: - Minimum 10 years' experience in environmental studies, ESIA and ESDD in projects of a similar nature; - Specific experience in environmental requirements according to local law Language Skills: Fluent in English; and Azerbaijani
HS Manager HS Experts	Compliance reporting and day-to-day oversight of OHS issues	On site	Education: B.Sc. degree (or equivalent qualification) in relevant sector. General Experience: Minimum 15 years of professional experience. Specific Experience: - Minimum 10 years' general experience as Health and Safety Specialist in projects of a similar nature; - Specific experience in safety of construction, audit and inspection for construction of metro projects. - Specific experience in Health and safety according to Azerbaijani laws;

Role	Responsibility	Location	Qualification Requirements
			Practical knowledge and understanding of AIB's Environmental and Social Framework and past working experience of assistance in their successful implementation or those of other IFIs. Language Skills: Fluent in English; and Azerbaijani
Labour Expert	Day-to-day interaction with all workers in the Project.	On site	Education: B.Sc. degree in human resources, law or social sciences. General Experience: Minimum 12 years of professional experience. Specific Experience: - Minimum 8 years' experience in labour management on construction projects, including subcontractor workforce; - Experience in labour audits and worker grievance mechanisms. - Demonstrated knowledge of the Labour Code of the Republic of Azerbaijan and the ILO core conventions; - Practical knowledge and understanding of AIB's Environmental and Social Framework and past experience of assistance in their successful implementation or those of other IFIs. Language Skills: Fluent in Azerbaijani; working proficiency in English.
Social Experts	Compliance reporting and day-to-day oversight of social issues	On site	Education: B.Sc. degree (or equivalent qualification) in social sciences General Experience: Minimum 15 years of professional experience. Specific Experience: - Minimum 10 years' general experience as Social Specialist in projects of a similar nature; - Practical knowledge and understanding of AIB's Environmental and Social Framework and past experience of assistance in their successful implementation or those of other IFIs. - Experience of working as Gender Specialist would be considered an advantage Language Skills: Fluent in English; and Azerbaijani

2.3.2 Operation Phase

2.3.2.1 Contractor

The Contractor roles are focused on the construction phase only. Therefore, there is no proposed role or management structure for them during the operational phase.

2.3.2.2 Owner's Engineer

The Owner's Engineer roles are focused on the construction phase only. Therefore, there is no proposed role or management structure for them during the operational phase.

2.3.2.3 Project Owner

BM will establish and maintain an Environmental, Social, Health and Safety (ESHS) team responsible for overseeing the environmental and social performance of the Project throughout its operational life. The operational ESHS team will form part of BM's existing corporate ESHS management system and will be integrated into the organisational structure responsible for the operation and maintenance of the Baku Metro network. The size and composition of the team will be periodically reviewed and updated to reflect operational needs, changes in legislation, and lender requirements. A preliminary staffing structure of the ESHS team for operation phase is set out in Figure 3 and Table 4 above.

The operational ESHS team will be responsible for implementing and maintaining the operational ESMP, monitoring compliance with applicable legal and lender requirements, coordinating environmental and social monitoring programmes, overseeing contractors engaged for maintenance activities, managing stakeholder engagement and grievance mechanisms, and ensuring that incidents are investigated and corrective actions are implemented. Where appropriate, specialist environmental or social consultants may be engaged to support monitoring, auditing or technical studies.

Operational arrangements will build upon BM's existing ESHS procedures and management systems already applied across the metro network. Lessons learned during the construction phase of the Project, as well as from the operation of existing metro lines and Phase I depot facilities, will be incorporated into operational procedures, emergency preparedness arrangements, maintenance planning and environmental and social management practices through BM's continual improvement process.

BM will undertake quarterly and annual internal monitoring of the Project's environmental and social performance. In addition, independent environmental and social audits will be commissioned at periodic intervals, or as otherwise required by lenders or applicable regulations, to verify compliance with the ESMP, identify opportunities for improvement, and ensure that operational environmental and social risks continue to be effectively managed throughout the Project lifecycle.

3. TRAINING

3.1 Overview

In achieving the approach to environmental and social management described in previous sections, it is implicit that all staff receive the required training in both general and job-specific terms. This training should not be considered a stand-alone exercise but must form an integral part of on-going training programmes.

Environmental and social training will help to ensure that the requirements of the ESIA, ESAP, ESMP and ESMS are clearly understood and followed by all personnel and that the parties involved have the right capability and capacity for their work.

The section describes the requirements training for environmental and social training in both the construction and operation phases.

3.2 Construction Phase

Staff training is a key aspect of managing environmental and social risks during the construction phase. The Contractor is responsible for developing and delivering training for construction staff and ensuring that sub-contractors are suitably qualified for their roles. BM and the Owner's Engineer are responsible for oversight of the Contractor and are ultimately accountable for ensuring that appropriate training is provided to construction personnel.

The environmental and social training programme for the construction phase will be finalised before the commencement of construction. All personnel shall receive a mandatory induction training (minimum one day) prior to being granted access to the construction site. Refresher training shall be provided at least annually, or more frequently where required due to changes in work activities, incidents, or updates to legal or lender requirements. In addition, daily toolbox talks shall be conducted by site supervisors to reinforce key environmental, social, health and safety requirements relevant to the planned activities.

Training programmes will be reviewed at least bi-annually to ensure they continue to meet Project requirements and international good practice, with updates made accordingly. The effectiveness of training will be assessed through attendance records, competency assessments, supervisor observations and, where appropriate, written or practical evaluations. Training records, attendance sheets and competency assessment records shall be maintained throughout the Project and retained for a minimum of five years following Project completion.

3.2.1 General Environmental and Social Awareness Training

All construction phase workers must receive in-house trainings on general environmental and social awareness. All project personnel must attend these training sessions irrespective of their position in the Project. With this E&S Awareness Trainings following will be provided:

- A general understanding of the environmental and social risks associated with the Project;
- National and lender requirements relating to environmental and social compliance, labour rights, working conditions and worker grievance mechanisms;
- Clarification of the Project's environmental and social policies (including relevant environmental and social management plans, Code of Conduct and ethical requirements of BM and the Main Contractor) and their practical implementation. This training will emphasise that these policies have implications for the working methods and responsibilities of all employees.

3.2.2 Environmental and Social Issues Training

- Contractor security personnel shall receive training on conflict resolution, de-escalation techniques and first aid.
- Training on the prevention of gender-based violence and harassment (GBVH) shall be provided to all personnel, including contractors, prior to mobilisation and refreshed at least every six months throughout the construction period.
- Environmental training shall cover, as a minimum, spill response, emergency preparedness and response, hazardous materials management, waste management and pollution prevention.
- In addition to the above, environmental training shall also focus on good construction site practices, including the use of designated material storage areas, installation of sediment control measures, protection of exposed soils from rainfall and wind erosion, dust suppression, and minimisation of exhaust emissions.

3.3 Operation Phase

The environmental and social training programme for the operational phase will build upon the existing training and capability that already exists for the operational Metro lines. It is the responsibility of the BM to update the metro lines' operational training requirements and processes in line with international best practice and lenders' requirements. This includes reviewing the existing staff capability to identify where changes are to be made.

All operational staff will need to be aware of new ESHS processes and systems that are introduced. This forms part of the remit of the operational ESHS management team.

All operational personnel shall receive a mandatory induction training prior to commencing operational duties. Refresher training shall be provided at least annually, or more frequently where operational changes, incidents, or updates to legal or lender requirements occur. Competency assessments shall be undertaken periodically to verify that personnel remain qualified to perform their assigned duties.

As new operational staff join, they will receive the updated general environmental and social awareness training, as well as the updated training for their specific role.

Training programmes will be reviewed at least annually to ensure they are meeting the Project requirements and international best practice, with updates made accordingly. Training attendance, competency assessment records and supporting documentation shall be maintained throughout the operational life of the Project and retained for a minimum of five years thereafter.

3.3.1 General Environmental and Social Awareness Training

All operation phase workers must receive in-house trainings on general environmental and social awareness. All project personnel must attend these training sessions irrespective of their position in the Project. With this E&S Awareness Trainings following will be provided:

- A general understanding of the environmental and social risks associated with the Project;
- National and Lenders' requirements on environmental and social compliance, labour rights and working conditions including grievance mechanism.
- Clarification of the environmental and social policies for the Project (informed by environmental and social policies/plans, ethical code/code of conduct of the BM and Contactor) and their practical implementation. This will emphasise that the policies carry implications for the working methods and responsibilities for all employees.

General awareness trainings will be provided to all personnel focusing the on labour rights, working conditions, grievance mechanism and the Code of Conduct.

3.3.2 Environmental and Social Issues Training

Training on the Grievance Mechanism and Gender Based Violence and Harassment (GBVH) reporting channels shall be provided to all workers prior to commencing work and refreshed at least every six months. The training shall also be provided to all newly recruited personnel and repeated following any major revision to the relevant procedures.

Security personnel of BM must receive conflict resolution, de-escalation techniques, and first aid trainings.

Environmental trainings will cover environmental issues including but not limited to spill response, emergency preparedness and response, hazardous material management and waste management.

The effectiveness of environmental and social training shall be periodically evaluated through competency assessments, supervisor observations and, where appropriate, practical exercises or knowledge assessments.

3.4 Training Records

Staff will complete and sign an attendance sheet for all courses attended, including the environmental and social awareness training or “toolbox talks”. Where applicable, competency assessment records shall also be maintained to demonstrate that personnel have achieved the required level of knowledge and competence. It is also recommended that staff complete a course evaluation sheet at the end of each course to assess the effectiveness of the training delivered.

All records, including the course evaluation and attendance sheets, will be held in a central location by the Health and Safety team (as part of the Contractor during construction, or as part of the BM during operation), and made available during any audit conducted as part of the audit programme. Training records shall be retained throughout the duration of the Project and for a minimum of five years following Project completion or cessation of employment, whichever is later.

The frequency and content of the training will be reviewed regularly to ensure it is effective, delivered in the correct manner and to the appropriate audience. Lessons learned during the Project and the findings of incidents, audits and inspections will be incorporated into the training programme as they arise.

4. ENVIRONMENTAL AND SOCIAL MANAGEMENT PROGRAM

This section details additional studies, management plans and associated mitigation measures which are required to avoid, minimise and compensate for the impacts identified in the ESIA. These plans have been identified as part of the ESIA and ESAP processes.

The management plans listed in Table 6, which have been prepared under the ESIA process and included in the tender documents, will be reviewed and updated by the Contractor.

In addition to these plans, a summary of the plans which will be developed by the Contractor is shown in Table 7 below.

BM and Engineer to review and approve all relevant management plans prior to the commencement of construction at the sites.

BM will update the Management plans prepared during the construction phase to address operational risks and impacts.

Table 5 summarises the principal environmental and social impacts identified in the ESIA, the key mitigation measures adopted in response, and the management plan through which each is implemented. It is a traceability summary only; the full mitigation measures are set out in the relevant chapters of the ESIA and in Table 9 and Table 10 of this ESMP, and the detailed implementation requirements are set out in the management plans listed in Table 6 and Table 7.

Table 5 Summary Mitigation Matrix

Topic of concern	Key impact	Principal mitigation	Implemented through
Air quality	Construction dust and PM emissions at sensitive receptors	Dust suppression, covering of haul vehicles, wheel washing, control of stockpiles, dust monitoring at receptors	Air Quality Management Plan; Dust Management Plan
Noise	Construction noise at residential and sensitive receptors	Noise barriers, plant selection and maintenance, restricted working hours, baseline and compliance monitoring	Noise and Vibration Management Plan
Vibration	Damage to and disturbance of buildings from TBM, piling and excavation	Pre-construction building condition surveys, vibration monitoring at sensitive structures, control of vibration-generating activities	Noise and Vibration Management Plan

Topic of concern	Key impact	Principal mitigation	Implemented through
Ground movement	Settlement affecting buildings and utilities above the alignment	Pre-construction building condition surveys, instrumentation and settlement monitoring against a 5 mm alert trigger and an 8 mm action trigger, TBM face pressure control, grouting where required	Instrumentation and monitoring requirements of the C-ESMP and associated method statements (see ESIA Chapters 12 and 17)
Waste	Generation and disposal of construction and hazardous waste	Waste segregation at source, licensed carriers and facilities, manifest reconciliation, waste minimisation	Waste Management Plan
Excavated spoil	Large volumes of spoil and risk of unauthorised disposal	Approved disposal sites, spoil registration and tracking, reinstatement requirements	Spoil Disposal Management Plan
Contaminated land	Exposure of workers and the public to contaminated soil, groundwater and ground gas	Pre-entry testing of excavation areas, ground gas monitoring, controlled handling and disposal, exposure controls and PPE	Contaminated Land Assessment and Management Plan
Hazardous materials	Soil and water contamination from fuels, chemicals and spills	Secondary containment, designated storage areas, spill kits and spill response procedures	Hazardous Materials Management Plan
Asbestos	Worker and community exposure during demolition and excavation	Pre-demolition asbestos surveys (PDAS), controlled removal, exclusion zones	Asbestos Management Plan
Water resources	Groundwater inflow during tunnelling and discharge of construction water	Groundwater modelling and monitoring, control and treatment of construction water before discharge	Water and Wastewater Management Plan (supported by the groundwater modelling study required)
Biodiversity	Loss of urban trees and vegetation and disturbance to fauna	Avoidance of retained trees, supervision by an Ecological Clerk of Works	C-ESMP
Cultural heritage	Damage to heritage assets and loss of previously unrecorded remains	Vibration control at heritage receptors, test trenching to approximately 5 m depth under archaeological supervision, chance find procedure	Cultural Heritage Management Plan including Chance Find Procedure
Community Health and Safety	Traffic accidents involving members of the public, pedestrians and cyclists	Traffic management and diversions, maintained pedestrian access, signage and lighting	Traffic Management Plan

Topic of concern	Key impact	Principal mitigation	Implemented through
Community Health and Safety	Public exposure to construction hazards, excavations and site access	Security, controlled access points, public information and advance notification	Community Health and Safety Plan
Accessibility	Loss of accessible routes during construction and inaccessible new stations	Interim accessible routes at affected stations, universal design compliance at design review milestones, accessibility audits	Community Health and Safety Plan – Universal Access Action Plan
Emergency preparedness	Tunnel collapse, groundwater inflow, fire including TBM fire, explosion, landslide, contaminated gas release and traffic accidents affecting workers and the public	Single integrated emergency organisation, scenario-based response protocols, coordination with the Ministry of Emergency Situations, evacuation arrangements and drills	Emergency Preparedness and Response Plan; Emergency Accessibility Action Plan
Occupational health and safety	Fatalities and injuries from high-risk underground and heavy civil activities	Permit-to-work system, method statements for high-risk activities, competency and training requirements, incident reporting and investigation	Occupational Health and Safety Plan; Lifting Management Plan
Labour	Worker welfare, contracts, working conditions and subcontractor compliance	Written contracts and social insurance registration, working hours and wage controls, worker grievance mechanism, Code of Conduct, labour audits	Labour Management Plan; Worker Accommodation Plan; Supply Chain Monitoring Procedure
Gender-based violence and harassment	GBVH – SEA/SH risk to workers and community members	GBVH policy and Code of Conduct, mandatory training, confidential and survivor-centred reporting channels, referral pathways	GBVH Policy and Gender Action Plan
Stakeholder engagement and grievances	Community concern, disruption and unresolved complaints	Disclosure and consultation programme, community liaison officers, two-tier grievance mechanism with defined response timelines	Stakeholder Engagement Plan; Grievance Management Procedure
Land acquisition and resettlement	Loss of land, assets, structures and livelihoods	Compensation at replacement cost, livelihood restoration, grievance redress for affected persons; access to land only after all permits are obtained and RAP commitments fulfilled	Resettlement Action Plan

Topic of concern	Key impact	Principal mitigation	Implemented through
Climate change	Extreme heat, flash flooding and thermal stress on infrastructure and workers	Climate risk and vulnerability assessment, heat stress controls during construction, flood gates and drainage design, operational thermal monitoring	CRVA, implemented through the ESAP, the EPRP and the CHSP

Table 6 Management plans which are included in the tender documents

Plan Name	Phase	Prepared by	Updated by	Reviewed by	Approved by	Submission Timeframe
Traffic Management Plan	Construction	E&S Consultant	Contractor	Engineer	Baku Metro	Before commencement of works
Waste Management Plan	Construction	E&S Consultant	Contractor	Engineer	Baku Metro	Before commencement of works
Spoil Disposal Management Plan	Construction	E&S Consultant	Contractor	Engineer	Baku Metro	Before commencement of works
Contaminated Land Assessment and Management Plan	Construction	E&S Consultant	Contractor	Engineer	Baku Metro	Before commencement of works
Cultural Heritage Management Plan incl. Chance Find Procedure	Construction	E&S Consultant	Contractor	Engineer	Baku Metro	Before commencement of works
Occupational Health and Safety Plan	Construction	E&S Consultant	Contractor	Engineer	Baku Metro	Before commencement of works
Community Health and Safety Plan						
- Universal Access Action Plan	Construction	E&S Consultant	Contractor	Engineer	Baku Metro	Before commencement of works
- Emergency Accessibility Action Plan						

Plan Name	Phase	Prepared by	Updated by	Reviewed by	Approved by	Submission Timeframe
Labour Management Plan	Construction	E&S Consultant	Contractor	Engineer	Baku Metro	Before commencement of works
Stakeholder Engagement Plan	Construction	E&S Consultant	Contractor	Engineer	Baku Metro	Before commencement of works
CRVA	Construction and Operation	E&S Consultant	Contractor	Engineer	Baku Metro	Before commencement of works

Preparation and execution of Resettlement Action Plan (RAP) are the sole responsibility of Baku Metro, and the Contractor's only ESS 2 responsibility is to verify that Baku Metro has secured "unencumbered access" before entering a site.

Table 7 Summary of Management plan requirements

Plan Name	Phase	Prepared by	Reviewed by	Approved by	Submission Timeframe
Construction Environmental and Social Management Plan including risk analysis	Construction	Contractor	Engineer	Baku Metro	Before commencement of works
Air Quality Management Plan with periodic dust monitoring measurements	Construction	Contractor	Engineer	Baku Metro	Before commencement of works
Noise and Vibration Management Plan with periodic noise and vibration monitoring measurements	Construction	Contractor	Engineer	Baku Metro	Before commencement of works
Water and Wastewater Management Plan	Construction	Contractor	Engineer	Baku Metro	Before commencement of works
Hazardous Materials Management Plan	Construction	Contractor	Engineer	Baku Metro	Before commencement of works
Security Management Plan	Construction	Contractor	Engineer	Baku Metro	Before commencement of works
Worker Accommodation Plan	Construction	Contractor	Engineer	Baku Metro	Before commencement of works

Plan Name	Phase	Prepared by	Reviewed by	Approved by	Submission Timeframe
Lifting Management Plan	Construction	Contractor	Engineer	Baku Metro	Before commencement of works
Asbestos Management Plan, where ACMs are identified	Construction	Contractor	Engineer	Baku Metro	Before commencement of works
Security Risk Management Plan	Construction	Contractor	Engineer	Baku Metro	Before commencement of works
Supply Chain Monitoring Procedure	Construction	Contractor	Engineer	Baku Metro	Before commencement of works
Station Level Interim Accessibility Management Sub-Plan under Universal Access Action Plan	Construction	Contractor	Engineer	Baku Metro	Before commencement of works
GBVH Policy and Gender Action Plan, and	Construction & Operation	Baku Metro (Implemented by Contractor)	Engineer	Baku Metro	Before commencement of works
Grievance Management Procedure	Construction	Contractor	Engineer	Baku Metro	Before commencement of works
Construction-phase Climate Risk Assessment	Construction	Contractor	Engineer	Baku Metro	Before commencement of works
Emergency Preparedness and Response Plan	Construction	Contractor	Engineer	Baku Metro	Before commencement of works
Dust Management Plan	Construction	Contractor	Engineer	Baku Metro	Before commencement of works

Table 8 details any additional studies that are required to inform the detailed design and construction management.

Table 8 Additional Studies Required

Additional study	Purpose	Detail of additional studies	Submission Timeframe	Prepared by	Reviewed by	Approved by
Building condition surveys (Stalinka/Khrushchev)	To establish the pre-construction structural condition of potentially affected Stalinka and Khrushchev residential buildings and provide a baseline for impact assessment and claims management.	Carry out detailed pre-construction building condition surveys for all potentially affected Stalinka and Khrushchev buildings located within the zone of influence of tunnelling and excavation works. The surveys shall document existing structural conditions and identify vulnerable buildings requiring enhanced monitoring during construction. Surveys must cover 100% of structures (including Stalinka/Khrushchev projects) within the 10 mm settlement contour or within a 50-meter buffer from the tunnel centerline.	Before commencement of works	Contractor	Engineer	Baku Metro
Groundwater modelling (drawdown vs receptors)	To assess the potential groundwater drawdown resulting from tunnelling and excavation activities and identify sensitive receptors that may be affected.	Develop a numerical groundwater model to predict groundwater drawdown associated with the Project, identify sensitive receptors (e.g. buildings, utilities, groundwater users and ecological receptors), and define appropriate mitigation and monitoring measures where required.	Before commencement of works	Contractor	Engineer	Baku Metro
Traffic capacity study (network-level with BCEA,	To assess the cumulative effects of Project traffic on the surrounding road network and identify appropriate traffic management measures in coordination with BCEA.	Undertake a network-level traffic capacity assessment covering the Project area and adjacent road network in coordination with BCEA. The study shall evaluate construction traffic impacts, cumulative effects with other projects, and identify appropriate traffic management and mitigation measures.	Before commencement of works	Contractor	Engineer	Baku Metro

Additional study	Purpose	Detail of additional studies	Submission Timeframe	Prepared by	Reviewed by	Approved by
Pre-construction noise/vibration monitoring at sensitive receptors.	To establish baseline noise and vibration conditions at sensitive receptors prior to construction activities.	Carry out baseline noise and vibration monitoring at representative sensitive receptors, including residential buildings, schools, hospitals and other sensitive land uses. The monitoring results shall be used to establish baseline conditions, validate impact predictions and define construction monitoring thresholds where necessary.	Before commencement of works	Contractor	Engineer	Baku Metro

4.1 Construction Environmental and Social Management Plan

The overarching C-ESMP will be prepared to provide guidance on ESHS management approach to be adopted by the Contractor and sub-contractors for all activities undertaken throughout the construction phase of the project (which shall be overseen by BM and Owner's Engineer).

The C-ESMP details the control steps necessary to reduce ESHS impacts through the entire construction phase, identifying as a minimum:

- A description of the works;
- Regulatory requirements;
- Site organisation and management;
- Roles and responsibilities;
- Review, reporting and auditing procedures;
- Mitigation and protection measures;
- Monitoring requirements;
- Training requirements;
- Emergency response plans; and
- Method statements (where applicable).

The C-ESMP will be supplemented by various separate sub-plans and procedures (as listed in Table 6 and Table 7) which will be developed to address key ESHS aspects identified during the ESIA process to detail control procedures and define associated responsibilities for implementation.

The Contractor develops the C-ESMP whilst BM and Owner's Engineer review and approve the document. The C-ESMP is also shared with local authorities, as required. The Contractor should comply with and implement the C-ESMP, although BM and Owner's Engineer are ultimately responsible for its implementation in accordance with international requirements.

Table 9 detail the mitigation measures defined in the ESIA for different environmental and social aspects of the Project together with the responsible party for construction phases.

4.2 Operation Phase – Environmental and Social Management Plan

For the operational phase, an overarching ESMP for operation phase will be prepared prior to operation of the Project in accordance with national legislation, standards and guidelines. The structure and objectives of the report will largely be the same as the C-ESMP. BM will be responsible for ensuring that the Project complies with mitigation measures outlined within this document for the operational phase.

Table 10 detail the mitigation measures defined in the ESIA for different environmental and social aspects of the Project together with the responsible party for operation phases.

Table 9 Construction Phase ESHS Management Plan

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
General	1	Environmental and Social Assessment and Management	AIIB ESS1 Compliance with national legislation	a) Baku Metro (BM) to establish an Environmental, Social, Health and Safety (ESHS) team to monitor the construction and operation of the Project, including - One ESHS Manager, - One Environmental Specialist, - One Social Specialist, - One H&S Specialist, - Two Community Liaison Officers (CLO) (one male and one female) b) Engineer to establish an ESHS team to monitor the construction of the Project, including - Two Environmental experts, - Two Social experts, - One H&S manager and two H&S experts, - One HR / Labor expert c) Contractor to establish a strong ESHS team with clearly defined roles and responsibilities, and authority including, - One International ESHS Manager, - One Environmental Manager and two Environmental Experts, - One Social Manager and two Social Experts, - One H&S Manager and two H&S Experts, - One HR/ Labour Specialist, - Two Community Liaison Officers - CLO (one male and one female)	a) BM to establish b) Engineer to establish c) Contractor to establish	The organizational structure, including the appointed specialists, must be established within 90 days of Project effectiveness and at least 60 days before issuing the first procurement order. This structure, should be maintained throughout the Project implementation.	- Organizational charts - Expert CVs
	2	ES requirements in Project Operations Manual (POM)	AIIB ESS1 Compliance with national legislation	BM to ensure POM contains the ES requirements, standards, criteria, codes, processes and procedures to be followed, as well as responsibilities and timeline.	- BM to prepare - Engineer to review	Before project effectiveness	POM has satisfactory ES content

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
General	3	Training and Capacity Strengthening	AIIB ESS1	Based on ES documents of the Project, provide trainings / orientation and awareness to the relevant targeted groups such as Contractor, Sub-contractors, stakeholders, communities and Project Affected Persons (PAPs). Exact nature of training and the target group may be adjusted as per the site condition and need during implementation.	• BM and Contractor to deliver • Engineer to verify	Prior to initiation of project activities and then conducted periodically throughout project implementation.	Training Records
General	4	Institutional E&S capacity	AIIB ESS1	BM to undertake a strategic institutional E&S capacity assessment and strengthening with the support of international environmental and social specialists, providing recommendations on institutional strengthening, staffing needs and qualifications, E&S systems including ESHS management system development in line with ISO 14001 and ISO 45001, corporate level ES policy, establishment of an ES permit register, resource requirements, training, exposure visits, and overall system functionality.	• BM	Within 30 days of Project effectiveness	Institutional capacity assessment report
General	5	Compliance with No Objection Certificates (NOC) and Permit Conditions	AIIB ESS1; National legislation	BM to maintain compliance with, and ensure that contractors comply with, all conditions established in the applicable permits, NOCs, and approvals throughout Project implementation.	• BM to obtain • Engineer to verify • Contractor to comply	Throughout project implementation.	NOC and permit compliance reports included in quarterly monitoring reports.
General	6	Country Regulatory Requirements	Azerbaijan legislation	Ensure all necessary regulatory requirements as per Azerbaijan's legislation are fully complied with in a timely manner including permission, NOC, licenses etc., are duly obtained. This may include, but not limited to: • Environmental clearances from Ministry of Ecology and Natural Resources (MENR) • Permits and licenses from relevant authorities • NOCs as applicable • Water supply and wastewater discharge permits from Azersu JSC • Permits for waste transport and disposal of excavated materials • Tree removal permits • Construction permits and approvals • Land acquisition clearances • Local Environmental Impact Assessment Ensure timely and regular consultation with relevant agencies before initiating	• BM to obtain permissions and licenses • Contractor to comply with permits	Before launching bidding process and start of construction activities, as applicable. Maintained throughout project implementation.	• Official correspondence letters with authorities • Declaration records • Permitting records

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
				interventions.			
General	7	Integration of ES considerations into Tender Documents (TDs)	AIIB ESS1	a) BM to ensure that AIIB's E&S requirements, including the ESAP commitments, are fully incorporated into the TDs and contractual obligations for the works contracts. b) BM to ensure that AIIB's E&S requirements, including the ESAP commitments, are incorporated into the TDs and terms of reference (ToR) for the Engineer.	- BM to prepare - External Consultants to support- if required	Prior to tender stages	c) E&S and ESAP requirements integrated into the TDs and works contract d) E&S and ESAP requirements integrated into TDs and ToR for the Engineer.
General	8	Supervision, Monitoring and Reporting	AIIB ESS1	Engineer to prepare and submit to the Bank regular Progress reports on ESHS status and performance/ compliance, including but not limited to the implementation of the ESAP, RAP, OHSMP, C-ESMP, status of preparation and implementation of E&S management tools / documents required under the ESAP, site observations on contractors performance on implementation of ESHS measures as well as stakeholder engagement activities, functioning of the grievance mechanism, training & capacity building activities etc.	- BM to approve - Engineer to verify - Contractor to report	Quarterly reports prepared and submitted to the Bank on an agreed format not later than 15 days after the end of each quarter. The reporting will be throughout the project implementation.	Timely E&S periodic reports
General	9	Engineer's Monitoring	AIIB ESS1	Engineer will need to undertake the following tasks during construction and commissioning: - Assess the capacity of contractors to manage ESHS risks regularly, - Develop an ESHS monitoring plan and monitor ESHS issues in line with the agreed KPIs through site inspections, document controls, and observations, - Develop records on ESHS inspections undertaken at construction sites, - Provide training to ESHS resources of the Contractor and their subcontractors, if required,	- Engineer to monitor - Regular monitoring by BM	Throughout project implementation	- Organizational chart and key personnel - Monitoring plan and records - Training records - Noncompliance reports (NCRs)

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
				- ESHS monitoring will include at a minimum: - Monitoring of dust generations, - Monitoring noise and vibration, - Monitoring settlements and its impacts on the existing buildings, - Monitoring water and wastewater management, - Monitoring waste management, - Monitoring hazardous material management, - Monitoring of biodiversity impacts. - Monitoring of labour and working conditions (including subcontractors' workforce) to national law and ESS 1, and worker grievance management, - Monitoring of forced/child labour and OHS risks in core suppliers, - Monitoring of gender/gender-based violence and harassment (GBVH) risks during construction both within workers and in communities, - Monitoring of resettlement/livelihood impacts, and compliance of potential temporary/permanent resettlement of households with ESS 1, - Monitoring of impacts on local business, - Monitoring of OHS and community safety risks, - Monitoring of cultural heritage impacts, - Monitoring of stakeholder engagement activities, including consultation meetings with affected people with a specific focus on vulnerable people/businesses, local authorities and CLOs, - Monitoring of external complaints management and reporting on these issues on a regular basis.			Complaint records
General	10	Contractor's Management Plans and Reporting	AIIB ESS1	The Contractor to develop and implement environmental and social management system (ESMS) (that includes ESHS management systems in line with the requirements of ISO 14001 and ISO 45001 standards) and plans (as per Azerbaijan legislation and AIIB ESS requirements) to mitigate E&S impacts and risks. The Contractor will review and update the following plans which are included in the tender documents: - Traffic Management Plan (TMP), - Waste Management Plan (WMP), - Spoil Disposal Management Plan (SDMP),	- Contractor to prepare - BM and Engineer to review and approve	Within 30 days following the commencement of the Contract Monthly reports prepared and submitted not later than 7 days after the end of each month. The	- ESMS in place - Approved plans - Timely E&S periodic reports

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
				- Contaminated Land Assessment and Management Plan (CLAMP), - Cultural Heritage Management Plan including Chance find procedure (CHMP), - Occupational Health and Safety Plan (OHSP), - Community Health and Safety Plan (CHSP), - Universal Access Action Plan, - Emergency Accessibility Plan - Resettlement Action Plan (RAP), - Labour Management Plan (LMP), and - Stakeholder Engagement Plan (SEP). The Contractor will develop the following plans in accordance with the performance specifications and minimum standards set out in the Bidding Documents by Baku Metro (e.g., minimum worker camp standards aligned with IFC guidelines, minimum security and GBVH protocols, etc.): - Construction Environmental and Social Management Plan including risk analysis (C-ESMP), - Air Quality Management Plan with periodic dust monitoring measurements (AQMP), - Noise and Vibration Management Plan with periodic noise and vibration monitoring measurements (NVMP), - Water and Wastewater Management Plan (WWMP), - Hazardous Materials Management Plan (HMMP), - Emergency Preparedness and Response Plan (EPRP), - Security Management Plan (SMP), - Lifting Management Plan (LIMP), - Asbestos Management Plan (AMP), where ACMs are identified - Security Risk Management Plan (SRMP), - Worker Accommodation Plan (WAP) - Supply Chain Monitoring Procedure, - Station-Level Interim Accessibility Management Sub-Plan under Universal Access Action Plan - Gender Action Plan (GAP) including GBVH issues, and - Grievance Management Procedure (GMP).		reporting will be throughout project implementation.	

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
				BM and Engineer to review and approve all relevant management plans prior to the commencement of construction at the sites. Contractor to provide monthly monitoring reports to BM and the Engineer on the implementation progress of the relevant requirements.			
General	11	Incidents and Accident Monitoring and Reporting	AIIB ESS1	Promptly notify the Bank of all fatality and high potential (Level 4) incident, which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including incidents that could result in fatalities, injuries, gender-based violence, etc. Provide sufficient detail regarding the incident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by Contractor and Engineer, as appropriate. Subsequently, prepare a Root-Cause Analysis (RCA) report on the incident including corrective action plan (CAP) to prevent its recurrence.	• BM to notify AIIB • Engineer to verify • Contractor to prepare	Notify AIIB through a flash report within 24 hours after learning of the fatal/ high potential incident. Detailed incident report no later than 72-hours. RCA report within 7 days of incident.	• Submission of incident Flash Report • Submission of detailed incident report. • Submission of RCA report.
Independent Monitoring	12		AIIB ESS1	BM to hire a Third-Party Validation (TPV) Consultant for monitoring and evaluation of ES requirements	• BM to appoint • TPV consultant to monitor	Biannual (six-monthly reports including annual and final evaluations) reports throughout the project lifecycle.	• Monitoring and evaluation report
Pollution Prevention and Environmental Monitoring	13	Environmental measurements	AIIB ESS1	Contractor to - Develop and implement an Air Quality Management Plan (AQMP) including real-time air quality monitoring, defined thresholds and triggers for action, and additional dust-suppression measures where the PM₁₀ 24-hour mean concentration exceeds the Project limit of 45 µg/m³. - undertake periodic measurements for air quality (PM10, PM2.5, SO2, NOx), noise, vibration and water quality monitoring measurements at the construction sites	• Contractor to implement • BM and Engineer to monitor	During construction	- Periodic monitoring reports - Mitigation measures as needed - Design assessment for protection

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
				c) develop mitigation measures to reduce dust generation, noise, vibration and waste d) Prepare and implement a Construction Water and Wastewater Management Plan. The plan shall assess and implement feasible water-reuse opportunities as part of the construction water-management strategy. e) Conduct soil and groundwater investigations according to CLAMP			against petroleum spills and soil & groundwater test results
Resource Efficiency and Pollution Prevention and Control	14			Contractor to adopt and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes, including: • Ensure necessary permits/agreements are in place for the disposal/transfer of waste to be generated in construction. • Designate a proper temporary waste storage area. • Keep track of waste disposal record with a waste register. • Keep an inventory of hazardous materials with all necessary documentation in place. • Implement resource efficiency and pollution prevention and management measures as mentioned in the ESIA.	• Contractor to implement • BM and Engineer to monitor	Adopt the WMP prior to the mobilization of contractor. Thereafter implement the WMP throughout project implementation.	• Periodic monitoring reports
Noise Baseline, Modelling and Mitigation	15			a) The Contractor will develop and implement environmental noise and vibration management plan during the construction phase b) Contractor to conduct more frequent monitoring and stakeholder engagement processes for areas with sensitive receptors such as residential areas, hospitals and schools. Contractor to prepare noise modelling before construction starts to ensure the necessary initial preparations for managing noise and vibration. Ensure noise and vibration measures defined in ESIA study including the installation of temporary noise barriers around the construction polygons are implemented. c) The environmental noise management plan will cover the following: • Control at source: - Noise emissions limits for equipment brought to the site. - Method of directly controlling noise, e.g., by retrofitting controls to plant and machinery. - The indirect method of controlling noise, e.g., acoustic screens, using alternative construction methodology; selection of quieter tools/machines; application of quieter processes. • Control across the site by:	• Contractor to implement • BM and Engineer to monitor	Before and during construction	a) Environmental noise and vibration management plan b) Additional measures near sensitive areas, noise modelling report c) Site controls and visual inspections, relevant documentation, monitoring reports, training records d) Noise and vibration measurement

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
				- Administrative and legislative control, - Control of working hours, - Control of delivery areas and times, - Physically screening site, - Noise monitoring ceases work until an alternative method checks compliance with noise level limits. - Training for more careful operation of machinery and use of tools, including toolbox talks and site inductions. d) Noise and vibration monitoring measurements before and during the construction phase should be undertaken by a licensed third party, especially at locations where large excavation activities (such as stations) will be undertaken e) Additional measures for vibration risks include: • A detailed building structure survey and risk assessment of all project-affected residents along the metro line and around the station • Baseline data on the residents and vulnerable groups that may be affected in the affected/ risky buildings • Continuously monitor vibrations in the identified risky buildings • An effective complaint management process to assess potential damages to the buildings by reputable third-party experts f) BM to monitor regularly the noise and vibration measures undertaken by the Contractor during construction and enforce additional mitigations in case of non-compliance at sites. g) BM to ensure that the following mitigation measures related to noise and vibration for operation phase are implemented by the Contractor during the construction phase; • Mass-Spring System (MSS): The installation of vibration isolation pads (slab track mats) between the track slab and the tunnel invert to decouple the system from the ground. • Rail Pad Softening: The principal rail pad stiffness to be reduced from 30 kN/mm to 15 kN/mm for the entire track to further dampen high-frequency energy. h) The Contractor must conduct post-installation noise and vibration audits within 30 days of track completion to verify compliance with Project Standards.			reports and other relevant documentation e) Building structure survey and risk assessment report for all project-affected residents along the metro line and around the station, vibration monitoring reports, complaints received, third-party reports (if needed) to assess damages to buildings f) BM records and relevant documentation related to monitoring

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
Contaminated Land Management	16			Contaminated Land Management: - Contractor to finalise the CLAMP, incorporating the findings of the Y-15 and Y-16 site investigations. Soil screening and testing protocol - Contractor to undertake pre-construction contamination delineation investigations at the remaining station locations and along the TBM alignment to define the extent of contaminated soil and groundwater. - Contractor to engage with the Ministry of Ecology and Natural Resources (MENR) to agree on risk-based assessment criteria and obtain any necessary approvals for contaminated land management. - Secure contract(s) with WMC LLC for contaminated soil and other contaminated materials prior to the commencement of construction. - Baku Metro to commission and attach a formal E&S Due Diligence Audit of the WMC LLC facility in Sumgait as an annex to the ESMP, confirming its technical and legal readiness to receive the project's waste (composite liner integrity, leachate management, remaining volumetric capacity, and environmental permits). - The request to be submitted to MENR for WMC LLC's annual and total capacity. - Contractor to identify and secure a licensed alternative facility for contaminated spoil prior to commencement of disposal activities. - Prior to the commencement of spoil disposal activities, Baku Metro's PIU and/or the Contractor shall obtain from WMC LLC written confirmation of - formal acceptance of the projected inert and Class B/C spoil volumes and the associated disposal programme, - the facility's numerical waste acceptance criteria, including limits for TPH-DRO, TPH-GRO, VOCs, PAHs and metals, - the validity and scope of the facility's operating licences, including its authorisation to receive inert (non-hazardous) waste, and - any permit limitations relevant to the Project where MENR authorisation is required for the release of facility capacity data, the request shall be submitted by Baku Metro. - Implement contaminated land management procedures as provided in ESMP - Soil screening and testing protocol - Investigation and delineation of hotspots - Segregation and proper handling procedures - Licensed disposal at approved facilities - Worker health and safety protocols	- Contractor to implement - BM and Engineer to monitor	Before and during construction Prior to the commencement of construction	- Finalised CLAMP - Investigation results - Engagement records with MENR - Secured contract(s)

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
Biodiversity Risks and Impacts	20	Biodiversity characteristics		a) Contractor to adopt and implement mitigation measures to safeguard biodiversity and habitat included in ESIA. b) BM to ensure that trees and flora are relocated to other locations and the former biodiversity characteristics are recaptured to conditions before construction activities	• Contractor to implement • BM and Engineer to monitor	• Throughout project implementation	• Measures are implemented at sites
	21	Tree Cutting and Compensatory Plantation		a) Contractor to comply with the required country regulatory requirements related to tree felling for example environmental clearances from MENR and NOC from relevant authorities b) Contractor to identify sites for compensatory plantation and prepare detailed Compensatory Plan for each proposed site. Carry out plantation activities and ensure proper maintenance, including care of planted saplings/seedlings and replacement of any that do not survive. c) Implement landscaping and greening works at construction sites including selection of native species, proper soil preparation, and establishment of irrigation systems for initial maintenance period.	• Contractor to implement • BM and Engineer to monitor	• Before commencement of works • Throughout project implementation.	a) Tree cutting inventory record and plantation inventory as per plantation plan. b) Plantation survival rate monitoring. c) Plantation Reporting Plan
Climate Change	22	Climate Resilience and Mitigation Measures		a) BM to ensure that climate measures are integrated into design and technical specifications b) BM shall assign overall responsibility for climate risk management to the ESHS Manager within the PIU. The ESHS Manager shall coordinate with the Environmental Specialist, Engineer and Contractor to oversee climate risks, adaptation measures, and compliance with the CRVA. c) BM to ensure that all required climate-related measures are implemented by the Contractor, including those identified in the Climate Risk Assessment, but not limited to the following: • Climate-resilient and energy efficiency measures in operations ○ Incorporate high-efficiency mechanical equipment considering climate projections which indicates temperature increases of 2–3°C (SSP2-4.5) and 5–6°C (SSP5-8.5) by the end of the century. ○ Incorporate passive heat mitigation measures, including high-performance thermal insulation of tunnel linings and structures, as well as optimised orientation and layout to reduce solar heat gain where feasible. • Urban heat island mitigation through landscaping • Stormwater management and drainage systems	• BM as accountable • Engineer to monitor • Contractor to implement	• Throughout design and construction phases.	• Climate measures incorporated in design. • Implementation monitored through periodic reports. • Climate KPIs covering temperature exceedance days, flood events at station entrances, and annual Caspian Sea level tracking

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
				Green building standards where applicable d) Contractor to produce a construction-phase climate risk assessment covering heat and flood schedule risk prior to mobilisation. e) Contractor to address heat and flood schedule risk prior to mobilisation. f) Engineer to verify the implementation of climate-resilient design measures and monitor climate-related performance during construction. g) Contractor to integrate defined measures in OHSP regarding the extreme heat waves and rainfall events into ERP for the construction phase. h) Contractor to monitor and report Scope 1 and Scope 2 emissions annually; Scope 3 embodied carbon to be reconciled against actual material consumption and reported at construction completion. i) Contractor to priorities lower-emission construction equipment and vehicles, including electric or hybrid equipment, alternative fuel vehicles, and newer machinery compliant, aligning with Azerbaijan's NDC commitments			
Gender-Based Violence and Harassment	23	Gender Action Plan (GAP)		BM to undertake the following tasks: a) To develop and implement a Project-specific gender action plan (GAP) including but not limited to: - gender-responsive recruitment, - skills development, - equal opportunity measures, - women's participation in project benefits, - accessibility, GBVH prevention and response, and - gender-disaggregated monitoring - taking steps to prevent gender-based harassment and violence - cooperation between BM with women's organizations, NGOs, relevant ministries, and international organizations b) BM to ensure gender policy, GAP measures are embedded into its contractor's contracts and monitor effective implementation regularly	- BM to prepare and approve - Engineer to verify - Contractor to implement	- Before commencement of works - Throughout project implementation.	a) Gender-responsive workplace strategy, and GAP document b) HR Policies & procedures of contractors c) Gender-responsive workplace strategy document d) Hiring records e) Hiring records and services provided by Gender quality f) Engagement documentation g) Hiring practice information

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
	24	GBVH Policy		Prevention of GBVH through Policy development and adoption by BM. Additional steps to include the Policy to be: a) Development and implementation of a GBVH policy and procedures b) GBVH policy should be included into the tender packages and contracts with all contractors, and shall be embedded into E&S policies and all relevant code of conduct and management plans, c) Communicated to stakeholders and impacted communities and passengers, d) Trainings and awareness raising activities shall be implemented to raise the awareness of BM personnel, passengers/wider community members using BM services and Project workers. e) Site-specific GBVH Action Plan to be prepared by the Contractor, separating community-facing SEA from workplace SH, establishing survivor-centered referral pathways, and signing Code of Conduct as a condition for site entry.	• BM to prepare and approve • Contractor to implement • Engineer to verify	• Before commencement of works • Throughout project implementation.	a) GBVH Prevention Policy b) Leaflets, brochures, posters, and digital training products such as awareness raising videos c) Meeting minutes d) Training records and minutes
Stakeholder Engagement	25	Stakeholder Engagement Plan		• Ensure that the Stakeholder Engagement Plan (SEP) for the Project is implemented, documented, and reported to the Banks in line with ESS1 requirements. • Disclose project information in accessible formats and languages • BM and Contractor to conduct consultation and awareness campaigns before and during construction on regular basis and document and report all its stakeholder engagement activities including number of meetings, trainings and complaints, etc. • BM and the Contractor to conduct a localized, house-to-house socioeconomic census within a 500-metre radius of the planned Y-14 to Y-17 station box footprints before the commencement of construction. The census will identify and map vulnerable households to inform station-specific safety and accessibility measures, including elderly persons living alone, persons with disabilities, and female-headed households with dependents.	• Contractor to support • BM to implement • Engineer to verify	• Before commencement of works • Throughout project implementation.	• Project-specific SEP • Engagement tools and materials produced • Records of SEP implementation
Cultural Heritage	26	Cultural Heritage Management Plan		a) Contractor to review, update and implement the Cultural Heritage Management Plan (CHMP) prepared for the Project and ensure that construction activities are carried out in accordance with the procedures and mitigation measures defined in the Plan. b) Ensure coordination with the Ministry of Culture of the Republic of Azerbaijan for design and construction activities located near registered cultural heritage assets and obtain any required approvals prior to works. c) Prior to construction tendering, ensure that a detailed baseline condition survey of the relevant registered cultural heritage asset and of the non-registered structures of potential heritage character is undertaken by a	• Contractor to implement • BM and Engineer to monitor • BM to approve • Engineer to verify	• Before bidding • Before commencement of works • Throughout project implementation	• Periodic monitoring reports • Engagement activity records • Implementation and Training records

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
				qualified heritage specialist and that the survey findings, together with the vibration and structural monitoring requirements, shall incorporated into the technical specifications of the bidding documents. Each survey shall comprise high-resolution photographic documentation, crack mapping and a structural condition assessment. d) Following contract award and prior to commencement of works in the vicinity of each identified structure, the Contractor shall verify and update the pre-construction condition survey records prepared at tender stage and extend the survey to any structure not previously recorded. Where a structure is identified as being of potential heritage value, works in its vicinity shall not commence until a determination of registration status has been obtained from the Ministry of Culture of the Republic of Azerbaijan and the Institute of Archaeology and Anthropology of ANAS. e) Undertake vibration monitoring at HRM-103 during station excavation and throughout the closest TBM passage, to verify the screening-level predictions and determine whether additional mitigation or a specialist structure-specific assessment is required. f) Once the architectural designs are sufficiently advanced, the Contractor shall undertake a design-stage visual impact assessment and integrate the applicable principles and assessment findings into the updated CHMP. Designs for above-ground components shall be submitted to the E&S team for heritage and visual review at each design stage, with regular coordination maintained between the Engineering and E&S teams throughout the design process. The design and implementation of above-ground components in areas of cultural heritage sensitivity shall be subject to the approval of the Ministry of Culture of the Republic of Azerbaijan, and final designs shall comply with national architectural guidelines and cultural heritage protection requirements. g) Maintain stakeholder engagement through Community Liaison Officers (CLOs) with local communities, municipal authorities, and other relevant stakeholders to identify cultural sensitivities and address potential concerns related to cultural heritage. h) Implement chance find procedures as provided in ESMP including: • Immediate work stoppage upon discovery • Notification to relevant authorities • Site protection and measures • Assessment by qualified archaeologists • Documentation and appropriate handling • Provide cultural heritage awareness training to all project workers on Chance Find Procedures		• Once architectural designs are sufficiently advanced and throughout the design process	

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
Grievance Mechanism	22	Project Grievance Mechanism:		Establish, maintain and publicly disclose a two-tier Project Grievance Redress Mechanism (GRM), comprising: • Site-level grievance mechanisms at construction sites to address day-to-day concerns of workers and nearby communities; • Baku Metro (BM) project-level GRM to manage escalated grievances and ensure oversight and resolution; • Multiple grievance intake channels, including telephone, email, in-person submissions, and suggestion boxes; • Procedures clarifying that SOS kiosks and station personnel are immediate assistance interfaces rather than separate grievance channels, with relevant cases subsequently referred to the formal Project GRM or, where involving GBVH/SEA/SH, to the restricted-access GBVH pathway subject to the complainant's informed consent; • Defined procedures and timelines for grievance acknowledgment, assessment, and resolution; • Confidential handling of SEA/SH-related complaints, following a survivor-centred approach and appropriate referral pathways; • Designation and training of GBV/SEA-SH focal points responsible for receiving and managing sensitive complaints; • Possibility to submit grievances anonymously; • Disclosure of AIIB's Project-affected People's Mechanism (PPM) for escalation where complainants are not satisfied with the Project-level process; and • Protect those who defend the rights of complainants to make such complaints. The GRM shall be accessible, transparent, culturally appropriate, and free of charge, and shall allow complainants to raise concerns without fear of retaliation or discrimination. GRM channels (phone, QR code, web form, in-person) must support anonymous submission to enable safe reporting of GBVH complaints. Anonymity of complainants must be guaranteed in the GRM procedures, and contractor focal points must be trained to handle GBVH reports without requiring identification.	• Baku Metro / PIU (overall oversight, reporting to AIIB); Engineer (review, supervision, monitoring); Contractor(s) (implementation)	Adopt GRM before Project effectiveness. Implement GRM throughout project implementation.	• Periodic monitoring reports with dedicated section on GRM functioning. • GRM log and resolution records.

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
	28	Public Grievance Reporting and Disclosure:		Public Grievance Reporting and Disclosure: Establish and implement a publicly disclosed grievance reporting mechanism, including an aggregated, privacy-protected grievance register and quarterly disclosure of grievance statistics, consistent with data privacy requirements. Disclosed information shall include, at a minimum: • number of grievances received; • grievance categories; • number resolved and pending; • average resolution time; • and corrective actions implemented where relevant. Grievance performance shall be reviewed internally on a monthly basis and disclosed externally on a quarterly basis through stakeholder engagement updates and/or project information channels.	• Baku Metro / PIU (overall oversight, reporting to AIIB); Engineer (review, supervision, monitoring); Contractor(s) (implementation)	Adopt GRM before Project effectiveness. Implement GRM throughout project implementation.	• Updated SEP • First public grievance summary report • Quarterly grievance statistics disclosures
Occupational Health and Safety	29	Non-Conformance Report (NCR) procedure		Develop a common NCR procedure. The NCR tracking list should be classified according to the type of hazards and standardized across reporting types.	• Contractor to implement • BM and Engineer to monitor • Engineer to issue and verify • BM to approve	Prior to the commencement of works	• NCR reporting procedure • NCR tracking list
	30	Housekeeping		Housekeeping at the construction sites needs to be organized and stored properly, and all unused materials should be removed.	• Contractor to implement • BM and Engineer to monitor	Throughout project implementation	• Visual inspections • Monitoring reports
	31	Permit to Work (PTW):		a) The work permit system should be included in the Occupational Health and Safety Plan, b) Job hazard analysis needs to be integrated with the work permit system c) Dedicated work permit forms should be prepared for work at height, electrical works and confined space d) LOTO (log out and tag out) procedure and activity should be in place (the electricity supply is shut off from the panel) for the electrical isolation integrated with an electrical work permit	• Contractor to implement • BM and Engineer to monitor	Within 3 months following the commencement of the Contract Throughout project implementation	a) OHS Plan including work permit system b) Work permit system to include job hazard analysis c) Work permit forms for work

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
				e) Appoint a dedicated person for each construction site in the project to coordinate subcontractors and support work permit issuer personnel f) Weekly work permit meetings should be held for platform areas and tunnel line works and should be announced on the information board at the entrance of the construction site			at height and electrical works d) LOTO procedure e) List of dedicated people appointed at each construction site f) Meeting minutes
	32	Lifting Management Plan		a) Develop and implement a comprehensive Lifting Management Plan covering all critical lifting operations associated with the Project, including activities such as TBM assembly and dismantling, removal of struts, and other complex lifting tasks. The plan shall include crane specifications, load characteristics, lifting calculations, lifting drawings, risk assessments, and method statements, as appropriate. All lifting operations shall be carried out in accordance with approved lifting plans and under the supervision of a competent and certified Lifting Supervisor, supported by suitably trained and qualified lifting personnel. b) Life expectancy should be set against metal fatigue for cranes, hooks/shackles, and wire ropes. All equipment must be numbered, and the operating hours should be recorded. The employees should carry out a visual inspection before starting the operation. If cracks, fractures, or other deformations are observed, these should be removed from operation. c) Wire ropes are needed to have adequate strength for the frequency and type of intended use and should be selected by ISO 4308 for cranes and lifting appliances. d) An adequate workforce for systematic electrical equipment and cables controls should be provided. In addition, before electrical equipment is taken to the site - stray voltage, working load, damage, insulation, etc. - should be subject to controls.	- Contractor to implement - BM and Engineer to monitor	Within 3 months following the commencement of the Contract Throughout project implementation	a) Lifting Management Plan; Appointment records/CV of the certified Lifting Supervisor b) List of equipment, operating hour records c) Properly selected wire ropes according to intended use, selection of wire ropes for cranes and lifting appliances according to ISO 4308 d) Appointed workforce for controlling

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
							electrical equipment and cables
	33	Infrastructure, Building, and Equipment Design and Safety		- Prior to entry for into construction tunnels, atmospheric monitoring shall be conducted to measure CH₄, O₂, H₂S, CO, LEL and VOC levels to ensure that conditions are safe for worker entry. - Adequate mechanical ventilation systems shall be installed and operated in the tunnels in accordance with applicable engineering ventilation standards and occupational safety requirements. Microclimate with respect to temperature and humidity in tunnels shall be monitored. - A Pre-Demolition Asbestos Survey (PDAS) shall be conducted by a certified asbestos specialist prior to the demolition of existing buildings around Station Y-16. Where asbestos-containing materials (ACMs) are identified, the Contractor shall prepare and implement an Asbestos Demolition Management Plan (ADMP), including safe removal, handling, transportation and disposal of asbestos waste in accordance with applicable regulations and international good practice. The AMP shall confirm: - worker asbestos-awareness training requirements and records; - competency certification for all personnel involved in ACM removal works; - clearance air monitoring following removal and prior to re-entry; and - references to applicable national regulatory requirements governing ACM handling and disposal. - An accredited independent third party shall conduct a structural integrity and safety assessment of existing equipment and structures that have remained unused for approximately ten years, including: - struts and stair towers, and tunnel segments at construction site Y-15; and - mobile cranes and associated foundations at construction sites Y-15 and Y-17	- Contractor to implement - BM and Engineer to monitor	Within 3 months following the commencement of the Contract Throughout project implementation	- Atmospheric monitoring methodology and records including CH₄, O₂, H₂S, CO, LEL and VOC - Tunnel Ventilation Engineering Design / Study - Asbestos Survey Report - ADMP, where ACMs are identified - Independent structural integrity assessment report
	34	Emergency Response Plan		a) Include third-party incidents in public, tunnel collapse, and groundwater inflow with more detail within the Emergency Response Plan. Steps to follow during an emergency need to be included. Emergency drills shall be conducted to test the worst-case scenarios. b) List the nearest hospitals to construction sites and specialized hospitals for a chest injury, bone fractures, burns, eye injuries, concussions, and limb loss,	- Contractor to implement - BM and Engineer to monitor	Before commencement of works; Maintained throughout project implementation	a) Revised Emergency Response Plan b) List of hospitals placed at each construction site and

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
				which are placed on each construction site and in the emergency response plan. c) Obtain accreditation approval for design capacities of the emergency carriers from the authorized body.			included with the Emergency Response Plan c) Accreditation approval for emergency carriers
	35	<u>Medical Surveillance and</u> Infectious and Communicable Diseases		a) Contractor to establish and implement a risk-based occupational health surveillance programme covering pre-employment and annual medical examinations, fitness-for-work assessments, and specialised health monitoring for workers undertaking safety-critical tasks or exposed to occupational hazards, including tunnel-related exposures. b) Contractor to develop and implement robust hygiene protocols,	- Contractor to implement - BM and Engineer to monitor	Throughout project implementation.	a) Medical surveillance programme and periodic monitoring record a) Protocols and implementation records
	36	Vibration and Building Integrity		- Undertake a detailed building structure survey, with particular attention to historical and sensitive structures, and risk assessment of all project-affected residents along the metro alignment and in the vicinity of stations. The structural integrity of buildings within the construction zone of impact will need to be assessed by qualified technical experts prior to the commencement of construction, and a building-specific risk assessment shall be conducted to identify potential construction-related impacts and required mitigation measures. Existing damage and cracks in buildings within the zone of influence are to be identified and photographed to record their general visual conditions. - Contractor to set up and maintain a deformation monitoring programme using: - settlement bolts and reflectors to measure vertical and horizontal movement in buildings and at the ground surface; - crack gauges to track crack movement; - reflectors to measure 3D deformation in tunnels; and - inclinometers at station buildings to measure lateral ground and structure movement. - Collect baseline data on the residents and vulnerable groups that may be affected in the affected/ risky buildings. - Continuously monitor vibrations in the identified risky buildings. - A reputable third-party assessment to analyze any potential/actual claims on damaged buildings during construction.	- Contractor to implement - BM and Engineer to monitor	Before commencement of works; Throughout project implementation	Mitigation measures for residential buildings/houses along the metro line and around stations including survey results and building evacuation and resettlement procedure

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
				- An effective complaint management process to assess potential damages to the buildings by reputable third-party experts. - If a building is deemed at high risk, Baku Metro must proactively trigger a RAP Addendum to temporarily or permanently relocate residents prior to the commencement of tunneling beneath their property, in full compliance with ESS 2. - Trigger thresholds, monitoring frequency and corrective actions to be defined and applied throughout construction.			
Community Health and Safety	37	Emergency Response Plan		a) Develop and implement a Project Emergency Preparedness and Response Plan (EPRP), including a communication and evacuation plan, covering all credible emergency scenarios during construction. The EPRP shall define emergency response protocols, roles and responsibilities, communication arrangements, primary responders and evacuation procedures for, at a minimum, TBM gas incidents, building damage or ground settlement, surface sinkholes, spills of contaminated materials, tunnel fires, GBVH incidents, and traffic accidents involving members of the public. BM shall ensure that emergency evacuation and, where necessary, temporary relocation procedures are established and implemented for residents and other affected receptors under credible worst-case scenarios. b) Additional mitigations will be developed and implemented to ensure the safety of children, the elderly and other affected people using the parks for recreational purposes, that will include: - Appropriate signage to be placed on the construction area - Continuous stakeholder engagement with residents - Training of the workforce to be aware of the vulnerable groups - Identify through a risk assessment how the community and the vulnerable groups will be impacted by the construction area and any supply route that will be used for supply and develop selected measures. c) Mitigation measures for businesses along the metro line and around stations: - The contractor will conduct a baseline survey and register all businesses, their contact details, basic economic data, and the number of people working in those businesses before construction. - The contractor will develop and implement appropriate measures to ensure construction impacts are avoided/minimized during construction, including effective management and monitoring of vibration/dust/noise impacts on local businesses and provision of regular access to local businesses around the stations.	- Contractor to implement - BM and Engineer to monitor	Before commencement of works; Maintained throughout project implementation	a) Communication plan and evacuation work emergency cases b) Measures for Vulnerable Groups c) Mitigation measures for residential buildings/houses along the metro line and around stations including survey results and building evacuation and resettlement procedure d) Mitigation measures for businesses along the metro line and around stations including survey results, complaint mechanism and building evacuation and resettlement procedure

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
				- An effective complaint management process to assess potential damages to the businesses by reputable third-party experts. The contractor will develop a procedure to compensate for income losses confirmed through an independent expert identified by BM. d) Along with the assessment, it is recommended that in cases where temporary or permanent resettlement is required due to household safety risks, the resettlement process (temporary or permanent) should be managed as per ESS 2 requirements. Therefore, a building evacuation and resettlement procedure should be developed and linked to the Emergency Response Plan before construction.			e) Building evacuation and resettlement procedure
	38	Traffic Management Plan		The Contractor shall review and update the Traffic Management Plan (TMP) for the construction phase to address the following aspects: - Safe access for pedestrians and local communities, including clearly defined pedestrian routes and appropriate signage for residents living around the worksite. - Vehicle speed limits and traffic movement control on both main and secondary roads to reduce the risk of traffic accidents associated with construction activities. - Installation of traffic diversion and warning signage at locations and distances determined by the competent city authorities. Additional signage shall be available on site and installed as required in accordance with the instructions of the relevant authorities. - Protection of workers involved in vehicle operations in both surface and underground construction areas, including traffic segregation measures and safety procedures. - Preparation of site-specific traffic management maps for each construction site, indicating: - designated pedestrian walkways with warning signage, - haulage routes for trucks transporting spoil, segments, cement, and fuel, - entry and exit points for construction sites, and - traffic movements associated with tunnel construction activities.	- Contractor to implement - BM and Engineer to monitor	Before commencement of works; Throughout project implementation	Traffic Management Plan

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
Community Health and Safety	39	Traffic and Road Safety		a) BM to ensure that Contractor and subcontractors' develop and implement road safety policy, practices, and procedures, including a defensive driving training program for the metro construction contractor and subcontractor drivers and evaluate drivers' skills, flagmen training for construction activities close to schools/kindergarten crossings b) BM to ensure that Contractor conducts regular risk assessments to address risks related to third-party access to the construction areas and dangers related to driving from the construction site to the excavated material storage areas, c) BM to ensure that Contractor monitors community safety risks and conducts root cause analysis of all incidents including road incidents involving 3rd parties during construction activities. d) BM to ensure that Contractor assesses the drivers' skills for heavy vehicles before hiring or evaluate the skills of existing drivers to ensure that they have the right driving skills and monitor the speed limits of the drivers daily. e) BM to ensure that Contractor develops Traffic Circulation Projects (including traffic surveys, modelling and simulations) for all construction sites and obtains all necessary approvals from the relevant authorities. f) BM to ensure that Contractor implements the following measures for safe accessibility: • Continuous fencing, hazard signage, night lighting • Temporary bridges/ramps to maintain access and clear pedestrian routing, • Emergency access lanes at all times • 5-day advance notice of access restrictions	• Contractor to implement • BM and Engineer to monitor	Before commencement of works; Throughout project implementation	a) Road Safety Policy and Procedures b) Regular risk assessments to address risks related to third-party access c) Monitoring records for community safety risks, root cause analysis reports of all incidents involving 3rd parties d) Assessment of the drivers' skills for the heavy vehicles e) Traffic Circulation Projects
Security Management	40			Contractor to prepare a Security Risk Management Plan to assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, guided by the principles of proportionality, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel. The Plan to cover: background screening of all security personnel before deployment; training on proportionate use of force, human rights and community interaction consistent with the Voluntary Principles on Security and Human Rights; and a complaint procedure for community members. The Plan to be submitted to lenders before commencement of works.	• Contractor to implement • BM and Engineer to monitor	• Before commencement of works • Throughout project implementation.	• Periodic monitoring report with dedicated section on security management

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
Labor Management	44	HR Policy	National Labor Law/ILO's core conventions	a) Contractor to develop and implement an HR Policy and a Personnel Regulation Procedure/Labour Management Procedure, which defines fundamental employee rights in line with national laws and ESS 1 requirements that include but are not limited to: - Grievance resolution, - Worker engagement, - Worker's organizations/trade unions, - Non-discrimination and equal opportunity, - Retrenchment, - Disciplinary procedures, - Collective Agreement, - Equal pay for equal work, - Policy on Gender Equality and to avoid gender-based violence and harassment, - Bullying and harassment, including sexual harassment, - Privacy policy and measures to avoid retaliation/reappraisal. - Child labor and forced labor, - Overtime, - Working hours, - Work-life balance, - Wages, benefits, and conditions of work and accommodation, - Social security of permanent and temporary employees. b) Contractor to prepare and disclose a Worker Code of Conduct, including mandatory provisions on Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH), and ensure it is signed by all workers. The Code of Conduct shall also include provisions on acceptable behaviour in local communities and management of worker–community interactions. c) BM and Engineer to ensure that the Contractor communicates its HR procedures and policies, including the grievance mechanism, to all its workers at the time of hiring, including awareness on labour influx-related risks, community interaction, and GBVH/SEA-SH prevention. d) Contractor to ensure that all sub-contractors adopt the Contractor's HR policy and standards through contractual requirements and regular audits	• Contractor to implement • BM and Engineer to monitor	Before and during construction	a) HR Policy, Personnel Regulation Procedure of Main Construction Contractor b) Communication records c) Contract documentation and regular audit reports

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
				e) Develop employee handbook and inform employees. The handbook should be distributed to the existing workers as well. f) Implement regular training for management and HR personnel on fair disciplinary practices and procedures to ensure consistent and objective application of disciplinary sanctions. Establish a system for employees to exercise their right to defense and conduct periodic reviews of disciplinary decisions to confirm fairness and compliance, thereby fostering an environment where employees feel their rights are protected.			
	45	Worker Grievance Mechanism		a) Establish and implement a “worker grievance mechanism” for all direct and sub-contracted employees. Prepare and implement a standalone Workplace Grievance Redress Mechanism Manual prior to civil works mobilisation. The workers’ grievance procedure will include but not be limited to the following: • A policy statement that grievances can be raised by any staff member, including workers or contractors, without fear of reprisals or anonymously. • Contact details for staff to whom grievances should be raised. • Informal grievance raising via line managers in the first instance. • Response times for grievances are categorized according to the severity of the grievance or the issue in question. • A process for logging grievances includes verbal, when, and how they are closed out. This should also include anonymous grievances, e.g., by placing locked grievance boxes in discrete locations out of sight, such as toilets. • Access to females to respond to grievances from women where appropriate. • A process for monitoring grievances to identify repeat or unresolved grievances and reporting these issues to senior management to expedite remedial action. • Ensure anonymity, non-retaliation and coverage of all contractor/subcontractor workers • Implement a safe reporting and response system specifically for SEA/SH/GBV grievances, aligned with a defined GBV referral pathway and linked to the overall Project GRM. b) Prepare and approve a procedure to explicitly protect workers’ representatives, including union representatives and labour stewards, from	• Contractor to implement • BM and Engineer to monitor	• Immediately after Contractor is selected • Prior to civil works mobilisation. • Throughout project implementation.	a) Grievance procedure b) Notices displayed at visible locations at the central offices and all fields c) List of committee (to deal with grievances members) d) Grievance Log e) Records of grievances and resolutions f) Grievance mechanism

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
				discrimination, dismissal, transfer or any other form of reprisal for raising or facilitating grievances c) Disclose the grievance mechanism to all employees, including the contractors, and a notice (summarizing the approach and providing contact details for staff to whom grievances should be raised) to be displayed at visible locations at the central offices and all fields. d) Appoint a committee to deal with grievances, which will include management, supervisors, and workers' representatives and will include women. e) Ensure that all grievances from all workers, including the contractors' workers' grievances, are recorded in the Grievance Log, and actioned in a reasonable timescale defined in the Grievance Procedure. f) Contractor to establish a separate, restricted-access GBVH/SEA-SH intake channel within the Worker GRM, ensuring survivor-centric protocols. g) Contractor to incorporate a dedicated referral pathway. h) Disclose PPM information at all site perimeters. i) Track and action grievances regularly.			
	46	Labor Audit		Engineer to conduct an internal labor audit (including accommodation camps) every quarter to ensure contractors' compliance with labor law and ESS 1 requirements during construction. The action will: a) Develop an internal audit plan for the Contractor and subcontractors and primary suppliers against the AIIB Environmental and Social Exclusion List (ESEL), b) Establish an internal labor audit team trained in Social Compliance, Labor rights, and regulations, c) Develop an internal audit procedure and checklist related to monitoring the labor rights of employees. d) Conducting labor audits. e) Establish specific corrective action procedures and contract termination triggers for persistent or severe non-compliance with labor and E&S standards. f) Implement a Contractor/Supplier Labor Compliance System that includes prequalification screening and regular auditing of the entire supply chain. g) 100% of primary suppliers undergo ESEL screening before contract award, with clear, non-negotiable contract termination triggers for any confirmed ESEL violations.	• Engineer or External consultants to monitor • BM to oversee	• Three Months after Contractor is selected • Throughout project implementation.	a) Internal audit plan for the main contractor and subcontractors b) Internal labor audit team and training report c) Internal audit procedure, Internal audit checklist d) Audit report

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
				Labour Audit framework to include formal Pre-qualification Labor and OHS Screening Protocol for all primary suppliers. If the capacity of Engineer's labor expert is not sufficient to conduct labor audit to international standards, then Engineer to assign a competent external consultant accredited by International Standards.			
	47	Accommodation Camps		a) BM to ensure that Contractor's accommodation camps align with IFC/EBRD Workers' accommodation process and standards (http://www.ebrd.com/downloads/about/sustainability/Workers_accommodation.pdf) prior to contractor mobilization b) WAP will include, at a minimum: • Risk-tiering by accommodation type (camp vs. dispersed housing arrangements); • Physical standards including WASH, fire and life safety, space, and lighting; • Worker welfare provisions covering recreation, mental health support, and family contact; • Subcontractor accommodation oversight; • Access to the Worker GRM for accommodation-related concerns. • Compliance with minimum space, ventilation, lighting, and thermal comfort standards • Provision of adequate WASH facilities, including safe drinking water and sanitation • Implementation of fire safety systems, emergency preparedness, and evacuation procedures • Measures to prevent overcrowding and ensure appropriate occupancy levels • Security arrangements that do not restrict workers' freedom of movement • Access to grievance mechanisms for all workers, including those in accommodation facilities • Regular inspection, monitoring, and reporting of accommodation conditions • Land screening against AIB requirements for any accommodation sites outside the confirmed project boundary, with supplemental RAP/LRP addendum prepared and approved prior to camp	• Contractor to implement • BM and Engineer to monitor	• Before Mobilization • Throughout project implementation.	• Worker accommodation camps are developed in line with IFC/EBRD - Workers' accommodation standards

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
				construction if involuntary acquisition or economic displacement is identified • Separate, secure, and lockable accommodation facilities for female workers, including dedicated sleeping quarters, sanitation, and washing facilities The WAP shall be updated if workforce numbers, nationalities, shift patterns, or construction logistics change materially.			
	48	Employee Data		BM to ensure that Contractor and its subcontractors record and share employee data in line with the legislation including but not limited to: • Provide a copy of the signed employment contract to the workers • Define the termination dates on the worker contracts • Keep the H&S records of workers in line with the legislation • Establish a work schedule for the Contractor workers in compliance with the Azerbaijan Labor Code (Əmək Məcəlləsi) and ESS 1 requirements • Record and process data in line with the Azerbaijan Personal Data Law (998-IIIQ) • Establish a systematic time recording system for workers of the Main Construction Contractor and its subcontractors	• Contractor to implement • BM and Engineer to monitor	• Throughout project implementation.	• Employee Contracts in line with legislation • Share a copy of the signed contract with each worker • Work hour schedule in line with Labor Code • Time recording system in place
	49	Non-discrimination and equal opportunity		• Establish a workplace gender equality policy including non-discrimination and equal opportunities requirements in order to outline the intent, priorities and practices for gender equality, and embed this in the HR policy. • Ensure that subcontractors have specific labor policy customized for non-national workers such as provision of all relevant documentation in their native languages (i.e. H&S signs, employment contracts, grievance procedure etc.). • Ensure that all national and non-national construction workers have obtained work permits. • Ensure that non-national construction workers are treated on a non-discriminatory basis and receive equal pay, working conditions, and access to the same social welfare benefits as national workers.	• Contractor to implement • BM and Engineer to monitor	• Throughout project implementation.	• Bi-annual (with ESAP update at the end of the year) Reports to AIIB
	50	Supply Chain		• Contractor to establish and implement a procurement control system and Supply Chain Monitoring Procedure to assess and monitor subcontractor and supplier performance against applicable legal requirements, client standards and International Labour Organization (ILO) standards, and to act on the findings.	• Contractor to implement • BM and Engineer to monitor	• Throughout project implementation.	• Supply Chain Monitoring Procedure

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
				Contractor to create and implement a subcontractor and supplier labour compliance system, including labor screening, binding labour and grievance mechanism clauses in contracts, regular audits, corrective action measures, and ensuring accessible worker grievance mechanisms for subcontractor and supply-chain workers.			
Cumulative Impacts	49			Mitigation measures for the Cumulative Impacts listed in Chapter 20 of the ESIA shall be implemented including but not limited to: - BM establish Cumulative Impact Working Group with BCEA, MENR; - quarterly shared monitoring data; - coordinated grievance management with neighbouring projects.	BM	Within one year from signing the loan agreement	- Working Group - Quarterly grievance statistics disclosures
Land Acquisition and Involuntary Resettlement	55	RAP		RAP to be finalised and disclosed well before construction tender and before any land entry.	BM	Before bidding and before any land entry.	RAP in place
	56	RAP Execution and Coordination:		- Establish a RAP Implementation Committee to carry out the entire RAP Implementation and complete on-site one-to-one surveys to identify the individual impacts on temporary and permanent basis. This survey shall be performed to ensure inventory of losses for all businesses facing hardship due to restricted access; by that a detailed matrix shall be developed. - Update the RAP based on the new information received on site and on desktop (official land acquisition data requested from the local authorities), - Prior to finalisation of the entitlement matrix and determination of compensation amounts, commission an independent Replacement Cost Study (RCS) by a qualified valuation appraiser independent of the Project. The RCS shall establish the valuation methodology, unit rates and an adjustment mechanism, compare national compensation rates against AIB ESS 2 replacement cost requirements, and apply the more stringent outcome. The methodology, assumptions and rates established by the RCS shall be incorporated into the RAP and disclosed to affected persons in an accessible form. - Develop measures for the individual entitlements under livelihood restoration programs - Prepare an Independent Retrospective Acquisition and Resettlement Due Diligence Assessment on past land acquisition data to identify the gaps and develop a Corrective Action Plan prior to bidding/load disbursement RAP Implementation Committee shall:	BM – RAP Implementation Committee	Continuous until RAP Completion Audit Prior to finalisation of the entitlement matrix and determination of compensation amounts Retrospective Acquisition and Resettlement Due Diligence Audit prior to bidding/load disbursement	- RAP Implementation Procedure - Payment records for compensation payments - Meeting records - Internal and external monitoring reports - Grievance log

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
				- Develop a and RAP Implementation Procedure to ensure all commitments within the RAP are fulfilled and the project is implemented as per these commitments - Ensure a RAP budget is available and ready for disbursement - Ensure the budget is allocated and disbursed per entitlements to re-establish the livelihoods and losses - Ensure completion of land acquisition for the remaining stations and emergency shafts, land delivery to be timely and prevent forced eviction - Verification of valuation to ensure compliance with replacement cost/market price - Ensure timely payments of compensations - Hold regular meetings between BM and RAP Implementation Committee to ensure entitlement are addressed and compensations qualify the losses in a timely manner and in parallel with construction schedule - Monitor the entire RAP Implementation and act pro-actively to prevent any potential adverse impacts			
	57	RAP Implementation Procedure:		Develop RAP Implementation Procedure to include: - Details on how RAP Fund disbursements will be arranged - The roles and responsibilities - The tools and documents such as PAP database structure, vulnerability analysis and scoring as well as cumulative impact register - Monitoring	BM – RAP Implementation Committee	Within 60 days of Project effectiveness and prior to construction tendering.	RAP Implementation Procedure
	589	Land Entry Conditions:		Ensure land entry to take place when all permits through local legislation is complete and all RAP commitments are in place and there is no forced eviction	BM – RAP Implementation Committee	ASAP	- Land entry protocols or documentation verify all identification and payment commitments are in place - Grievance log
	6059	Internal Monitoring:		Ensure a regular monitoring is arranged to follow the land acquisition progress, resettlement, grievances and budget are followed to mitigate the risks of failure in each, and to make recommendations or actions taken against potential risks	BM – RAP Implementation Committee	Together with start of RAP implementation	- Internal reports containing: - Land acquisition documentation

Aspect	No	Subject	Requirement	Mitigation Measures	Responsibility	Timing	Performance Indicator/Monitoring Requirement
							- and payment records • Land entry protocols (if any) or consent of PAPs • Grievance logs
	601	Public disclosure and Guide to Land Acquisition (GLAC):		• The RAP shall be disclosed to PAPs and the communities. • A summary of RAP document containing summary of RAP commitments, entitlements and point of contacts shall be delivered to permanently and temporarily affected PAPs.	• BM – RAP Implementation Committee	Finalisation of RAP	• Disclosure documentation • Summary document (GLAC) delivery records • Grievance logs
	612	RAP Monitoring:		• Perform internal and external monitoring as per the RAP, with definite KPIs given by the RAP • Perform a Completion Audit to identify (if any) and close-out the RAP	• BM – RAP Implementation Committee	Following 1 year after RAP implementation starts	• Internal reports • External reports • Completion audit
	623	RAP Budget Management:		Periodically review and update the RAP budget as necessary to ensure all compensation measures are addressed	• BM – RAP Implementation Committee	Quarterly until RAP completion	• Internal reporting in a separate section
	634	Compulsory Acquisition and Legal Eviction Protocols		If land acquisition cannot be completed through negotiated agreement despite the implementation of all RAP measures, compulsory acquisition and any legal eviction shall only be used as a last resort and in accordance with applicable national legislation and AIIB ESS2 requirements. Before initiating any compulsory acquisition or legal eviction, BM shall notify the AIIB and demonstrate that all RAP commitments have been fulfilled, affected people have been adequately informed, and every reasonable effort has been made to reach a negotiated agreement. Any legal eviction shall be carried out only by the competent authorities and without the use of disproportionate force. Any legal eviction must strictly avoid the use of disproportionate force and adhere to due process.	• BM – RAP Implementation Committee	Notifications to be placed at least 30 days before official eviction procedures initiated	• Information notes detailing the RAP engagements, documentation and grievances log • RAP Internal Monitoring reports

Table 10 Operation Phase ESHS Management Plan

Aspect	No	Subject	Requirement	Mitigation Measures	Responsible Party	Timing	Performance Indicator/Monitoring Requirement
General	16		AIIB ESS1	a) BM to obtain all environmental permits for the operation of metro facilities b) BM to conduct necessary maintenance- repair works on boilers and burners and adjust them properly to ensure all parameters for flue gas emissions are within the threshold as per the regulation. c) BM to ensure that operational activities at all facilities will comply with air quality regulations.	BM	As needed by regulatory requirements	a) Environmental Permits b) Maintenance records c) Communication with authorities
General	18		AIIB ESS1	a) BM should ensure that new temporary waste storage areas will be established according to the Waste Management Regulation provisions. b) BM should ensure that industrial waste management plan is submitted and approved by the authorities c) BM should ensure that all types of wastes are declared in accordance with Waste Management Regulation and are in line with the industrial waste management plan	BM	Prior to commercial operations / revenue service.	a) New temporary waste storage areas b) Approved industrial waste management plan c) Waste declaration forms
General	19		AIIB ESS1	BM to perform an inventory of the transformers, undertake representative sampling in the transformers to analyse for PCB content in transformer oils, and develop a relevant phase-out plan for transformers if PCB is identified.	BM	Prior to commercial operations / revenue service.	• Inventory of transformers • Oil testing records Phase-out planning, if necessary, based on testing results
Climate Change	22		AIIB ESS1	• Cooling-plant and heat-rejection equipment to be specified with capacity headroom for elevated outdoor design conditions (+2–3 °C mid-century, up to +4–5 °C end-century above the historical ASHRAE value), with reserved physical, electrical and structural provision for staged augmentation of cooling capacity at equipment-replacement cycles. • The design dry-bulb to be reviewed against an updated, climate-adjusted design condition at each major refurbishment / equipment-replacement cycle, and cooling capacity re-sized accordingly. • Implement pre-cooling during off-peak and overnight hours to reduce morning station temperatures and peak daytime cooling demand.	• BM as accountable • Engineer to monitor	Throughout design and construction phases.	• Climate measures incorporated in design. • Implementation monitored through periodic reports.

Aspect	No	Subject	Requirement	Mitigation Measures	Responsible Party	Timing	Performance Indicator/Monitoring Requirement
				- Procedures for shutting down works, evacuating workers, securing cranes and materials, and managing public safety around construction zones during extreme events. - Implement temporary bunds, cofferdams, diversion channels, sump pumps, and backup power to keep shafts and station boxes dry during storms. - Implement operational mitigation measures defined in CRVA and ERP. - BM to monitor and report Scope 1, Scope 2 and avoided emissions annually, integrated into the existing Ecology Passport / ESHS reporting cycle with reflecting contribution to national NDC targets.			
Health and Safety	41		AIIB ESS1	- Conduct life and fire safety assessments for the integration of existing and planned metro lines, tunnels, and stations by a qualified accredited third-party consulting firm. - Upgrade the Preventive Maintenance Module System (document management system) instead of excel & hard copy maintenance control system for all maintenance for stations and vehicles. - Determine the inventory the station tunnels at risk of flooding groundwater intrusion which immediately responds to drainage of the water covered. Include ground water flood into emergency preparedness and response plans, and to ensure necessary measures (including well-structured staff training) are in place. Integration flood control system sensors need to be included into new signalisation system during the construction project - Baku Metro should organize top table exercise on an annual basis and test the worst-case scenario as business continuity of the Baku Metro (e.g. serious damage of the construction during an earthquake or one of the critical processes out of use or interruption due to landslide, construction retaining wall collapses and groundwater inflow for the extension project). Top table exercise should be performed and these worst-case scenarios should be tested. Baku Metro emergency team members should be trained professionally on how to react in the event of a worst-case scenario. - Many emergency exits between platforms and tunnels were padlocked with turnstile, requiring master keys, which could cause delay on evacuation or manual unlocking is required. Baku Metro shall replace padlocked emergency exit arrangements with panic hardware or equivalent fail-safe devices permitting egress without	BM	Within one year from signing the loan agreement	- Life and Fire Safety Review reports - New Maintenance Module

Aspect	No	Subject	Requirement	Mitigation Measures	Responsible Party	Timing	Performance Indicator/Monitoring Requirement
				keys and shall verify unobstructed passage through all emergency exits as part of the routine inspection regime. Improvement SOS phones on platforms some of them are currently non-functional and need to be renovate and integrated with new construction project in line with central announce system from the SCADA room. Accessibility for wheelchair users and elderly people is very difficult at old constructed stations. Special equipment should be provided to carry them on escalators. Install warning strips and safety signs at vehicle for the blind disable people at missing stations platform.			
Health and Safety	42		AIIB ESS1	BM to develop a Key Performance Indicator (KPI) system for - Health and Safety (HS) including total working hours, number of lost time and recordable accidents, near miss, none-conformities, recordable injury frequency and severity rates, - Community Health and Safety including driven kilometres, road traffic accidents, 3rd party involvement during waste transportation, passenger incidents such as security - fight or aggression inside the vehicles and stations, fall from the escalator etc. - Develop accident & incident investigation and reporting system to avoid recurrences.	BM	Within one year from signing the loan agreement	- KPI system and related documentation - Accident & Incident investigation reporting
Health and Safety	43		AIIB ESS1	Enhance the existing OHS system, review, and update procedures with detail (including but not limited to): - Prepare Job Safety Analysis for each high-risk task activity in the risk assessment process - Conduct risk assessment and implement necessary mitigation measures for midnight shift and working alone - Review manual handling risk assessment at the maintenance workshop	BM	Within one year from signing the loan agreement	- Job Safety Analysis for each high-risk activity - Risk assessment for midnight shift and working alone and necessary mitigation measures as needed - Revised manual handling risk assessment if needed
Labor Management	51	HR Policy		BM to align its HR policies with ESS 1 through the following actions: Include policies on grievance resolution, non- discrimination and equal opportunity, retrenchment, equal pay for equal work, gender equality, bullying and harassment, including sexual harassment, GBVH, child labor and forced labor, overtime, working hours, work-life balance, wages, benefits, and conditions of work and accommodation, social security of permanent and temporary employees, worker engagement, workers organizations/trade unions.	BM	Within one year from signing the loan agreement	- Copy of revised HR policy & HR Procedures - Training Records - GBVH focal points information - Contractor Policy and handbook

Aspect	No	Subject	Requirement	Mitigation Measures	Responsible Party	Timing	Performance Indicator/Monitoring Requirement
				b) Communicate and train all BM employees on the HR procedures and policies, including the Social Responsibility and Ethics Policy c) Develop GBVH focal points reporting and supporting mechanism d) Ensure to BM's HR, social responsibility policy and ethical standards are adopted by contractors. It is recommended to provide a handbook (including explanation of a grievance mechanism) for all workers including subcontracted employees to inform them at the time of hiring.			
	52	Wage Compliance Audit and Remediation		BM shall commission a formal, independent wage compliance audit covering the period from January 2024 to present, encompassing: a) Verification that no current or recent employee has been paid below the national minimum wage (Minimum Wages in Azerbaijan remained unchanged at 400 AZN/Month in 2026 from 400 AZN/Month in 2025.) b) Verify the total number of workers who received payments below the minimum wage and calculate the exact underpayment amounts and ensure that back-pay is paid to these workers; c) Ensure that all trainees are remunerated during both theoretical and practical training periods for on-the-job training purposes, and this remuneration must not be lower than the legal minimum wage; revision of the internship policy to ensure that all individuals engaged in training periods are classified as workers and remunerated from their first day of engagement. d) Ensure to make full payment for holidays, discontinue the practice of substituting sick leave for overtime, and standardize overtime and double pay across all departments to maintain internal equity; Audit findings, remediation records, and the revised internship policy shall be submitted to the PIU and disclosed to the lenders prior to first loan disbursement.	BM	Within one year from signing the loan agreement	a) Independent wage audit report submitted to PIU; b) payroll and time card records demonstrating minimum wage compliance for all workers; c) documented back-pay; revised internship policy approved and in force; d) overtime payment records demonstrating compliance with Labour Code rates
	53	Retrenchment		BM to address the root causes of labour disputes and reduce the likelihood of workers resorting to formal legal proceedings:	BM	Within one year from signing the loan agreement	a) Employment retention procedure b) Mediation records

Aspect	No	Subject	Requirement	Mitigation Measures	Responsible Party	Timing	Performance Indicator/Monitoring Requirement
				a) Adopt an employment retention approach as the primary response to workplace disputes and performance-related concerns. Termination shall be treated as a measure of last resort, pursued only where all alternative remedies have been exhausted and documented; b) Where a dispute arises between the company and a worker whether relating to wages, working conditions, or contractual terms the parties shall first seek resolution through structured mediation before any legal or administrative process is initiated. Mediation proceedings shall be documented and outcomes recorded in writing; c) Implement a proactive grievance identification system, enabling supervisors and human resources personnel to detect and address emerging worker concerns at the earliest possible stage, prior to escalation; and d) Where a dispute is resolved, whether through mediation or direct negotiation, the agreed outcome shall be recorded in a signed settlement document, providing clarity and finality for both parties.			c) Grievance identification and tracking system d) Settlement agreements signed by relevant parties

4.3 Estimated ESMP Implementation Costs

The following table presents the indicative costs for the implementation of the Environmental and Social Management Plan (ESMP) for the Green Line Extension Project. The estimates have been prepared for budgeting purposes at this stage and are based on the current ESMP requirements, the anticipated 44-month construction period, the required environmental, social, health and safety staffing arrangements, and the Contractor's responsibility to prepare, update and implement the Construction ESMP and related site-specific management plans.

The costs will be reviewed and updated during detailed design, procurement and construction planning, once the Contractor's methodology, detailed management plans, Owner's Engineer scope, staffing arrangements and final construction budget are confirmed.

Table 11 Estimated ESMP Implementation Budget

No.	Item	Approximate Cost / Percentage of Budget (USD)
Documentation		
1	Green Line Extension ESIA / ESMP finalisation and updates	250,000
2	E&S management plans prepared for the Green Line Extension by consultant and to be updated, implemented and approved during construction by the Contractor: TMP, WMP, SDMP, CLAMP, CHMP (incl. Chance Find Procedure), OHSP, CHSP (incl. Universal Access Action Plan and Emergency Accessibility Plan), RAP, LMP, SEP, and CRVA	Preparation included in project preparation / consultancy costs; update, implementation and approval included in Contractor's bid price / BoQ
3	Contractor's Construction Environmental and Social Management Plan including risk analysis (C-ESMP), Air Quality Management Plan with periodic dust monitoring measurements (AQMP), Noise and Vibration Management Plan with periodic noise and vibration monitoring measurements (NVMP), Water and Wastewater Management Plan (WWMP), Hazardous Materials Management Plan (HMMP), Emergency Preparedness and Response Plan (EPRP), Security Management Plan (SMP), Lifting Management Plan (LIMP), Asbestos Management Plan (AMP) where ACMs are identified, Security Risk Management Plan (SRMP), Worker Accommodation Plan (WAP), Supply Chain Monitoring Procedure, and Station-Level Interim Accessibility Management Sub-Plan under the Universal Access Action Plan.	Included in Contractor's bid price / construction contract / BoQ as part of C-ESMP implementation costs
Staffing		
4	BM / PIU ESHS Team, including ESHS Manager, Environmental Specialist, Social Specialist, H&S Specialist and two Community Liaison Officers	660,000, assuming 6 project-dedicated staff × 2,500/month × 44 months
5	Green Line Extension Owner's Engineer E&S Staff	440,000 (construction duration, assumed 44 Months)
6	Green Line Extension Contractor E&S Staff	440,000 (construction duration, assumed 44 Months)

No.	Item	Approximate Cost / Percentage of Budget (USD)
ESMP Implementation Costs		
7	Monitoring — periodic environmental monitoring during construction covering air quality (PM10/PM2.5/SO ₂ /NO _x), noise, vibration and adjacent-building settlement, and groundwater/discharge conditions, using periodic monitoring campaigns, real-time monitoring stations and pre-construction building condition (dilapidation) surveys. This item also covers emergency preparedness (emergency-response drills, site medical provisioning and emergency equipment for underground works); stakeholder engagement and grievance management (SEP implementation, consultation and awareness activities, and the community and worker grievance mechanisms); independent monitoring and audits (Third-Party Validation consultant and quarterly labour audits); and internal/external monitoring of RAP implementation. RAP land acquisition and compensation are budgeted separately under the project RAP/LARPF	~1,075,000
8	Training — delivery of the project training programme for the PIU, Engineer, Contractor and subcontractors, covering AIIB safeguards and C-ESMP requirements, OHS, cultural heritage / chance-find, stakeholder engagement, spoil and wastewater management, reporting and site monitoring	~50,000
9	Laboratory analysis — accredited-laboratory analysis of water/wastewater discharge quality and of soil and groundwater samples under the contaminated-land management plan (CLAMP)	~75,000
	Subtotal	~2,990,000
	Contingency (10%)	~300,000
	TOTAL (Construction Phase)	~3,290,000
Operation Phase Costs		
10	Operation phase ESMP implementation, including operational environmental and social management, monitoring, reporting, stakeholder engagement, grievance management and ESHS oversight during operation	TBD – to be included as part of Baku Metro O&M costs

5. MONITORING AND REPORTING REQUIREMENTS

5.1 Overview

For an effective environmental and social management, the ESHS should be continuously monitored and periodically reviewed.

BM will monitor:

- the compliance of the ESMS with the environmental and social provisions of the legal and other requirements as well as the commitments given in the ESMP;
- overall implementation of the ESMP and other plans and procedures; and
- improvements achieved as the Project progresses.

Periodical internal audits, independent parties' audits, regular checks, site inspections and measurements, impact monitoring, implementation of the processes in accordance with the ESMS and regulations, regular audits of the overall implementation of the ESMP and site inspections will be used for this purpose. Realization of environmental targets and objectives, environmental and social performance, equipment calibrations, air emissions, energy, fuel and natural source consumption, noise, waste amounts, environmental and social complaints and similar issues will be monitored, measured and evaluated. Conformance with legal and other requirements will be periodically evaluated and recorded.

5.2 Construction Activities: Internal Monitoring

The frequency of these activities and associated reporting will be undertaken as per the ESHS Management Plan. BM should undertake a review of all the individual management plans, once per year or if an event triggers the update of a management plan and devote enough ESHS capacity for regular oversight on construction activities.

5.2.1 Day to Day Monitoring

The Contractor will undertake compliance monitoring of the sub-contractors environmental and social compliance on a regular basis, proposed to be at least weekly. This will be carried out in accordance with the approved ESHS Management Plan. It will include regular general environmental and social site walkovers to identify any OHS, labour-related, environmental or social concerns and ensure compliance. Any notes made during site visits are to be collated on a standard form and saved. This will include any actions that have been taken or that will be taken (if required). Furthermore, the environmental and social capability across various construction teams should be developed to enable identified team members to be able to recognise and report environmental and social issues beyond general awareness or labour performance and job-specific issues that would form part of the standard E&S training; these would be reported to the site environment and social management team. This system provides more staff able to note day to day issues.

5.2.2 Monthly Reporting

This section represents a framework of what the monthly reporting is likely to include, but the details are to be agreed between BM, Owner's Engineer, Contactor and the Lenders.

The Contractor ESHS team will provide the necessary information for BM and Owner's Engineer to prepare a monthly report to share with the Lenders during construction. These monthly reports should include information on the following:

- Information on the progress with the Project, main achievements and challenges of the month ahead.
- Progress in implementing the ESHS Management Plan and the individual management plans.
- Incidents and accidents, number of staff working on site (including sub-contractors) and security/H&S statistics.
- Monthly OHS activities reports issued by the Owner's Engineer and submitted to BM PIU.
- Labour performance including all construction contractors. The labour performance reporting template should be reviewed and agreed with the Lenders. All construction contractors will report on their labour performance using the agreed reporting template.
- Social performance and statistics on complaints received. This should also include information on the actions taken to address the complaints raised.
- Environment activities and statistics on environmental incidents. This should also include actions taken or measures to be put in place to address any non-conformities noted on site.
- Outstanding non-compliance reports and their proposed close-out dates.
- Summary of any complaints by external bodies and actions taken/to be taken.
- Any breaches of the acceptable standards specified by law/construction permits and/or the ESMP, using a non-compliance report.
- List of sub-contractors.
- Update on programme of activities.
- Information on permits, quality assurance, other relevant contractual information.
- Relevant changes or possible changes in legislation, regulations, and international practices.

As part of the project ESAP, the Lenders have outlined the requirement of monthly updates to them of progress against implementation of the ESMP during the construction phase.

5.2.3 Periodical Reporting

BM and Owner's Engineer will produce periodical reports, within intervals as agreed with the Lenders. These are comprehensive reports on the environmental and social performance of its facilities and

operations related to the Project and the implementation of the ESMP. They will include a summary of key E&S aspects during the reporting period, action plan status and update, deviations/non-compliance and feedback. BM will ensure that all the necessary reports are produced and submitted to Lenders in a timely fashion in order to achieve on-going regulatory compliance.

BM will periodically disclose summary information on the Project's environmental and social performance to affected communities and other interested stakeholders. Public disclosure may include quarterly community newsletters, information boards or posters at station construction sites, updates through the Project grievance mechanism, and publication of an annual Environmental and Social Performance Summary on BM's website. The information disclosed will include, where appropriate, progress in implementing the ESMP, key environmental and social monitoring results, community health and safety information, grievance statistics, and significant incidents together with the corrective actions implemented, while respecting confidentiality requirements

5.2.4 Environmental and Social Baseline Monitoring

BM and Owner's Engineer should ensure environmental monitoring requirements are met in the form of an overarching Environmental Monitoring Programme, as part of the ESMS.

In line with the environmental and social effects identified within the ESIA, and to be in accordance with the project ESAP, monitoring of the environmental and social baseline is a requirement of the mitigation that has been identified. This will ensure that the management measures that have been identified for the construction phase of the Project are working.

Where monitoring identifies exceedances in the standards that are being applied, then environment and social management measures need to be reviewed for their effectiveness. Changes would be made to these management measures or to construction practices to ensure compliance with the standards.

Table 13 outlines the minimum construction phase environmental and social monitoring regime, including responsible parties, frequency of monitoring, and potential actions in the event of an exceedance.

5.2.5 Noise and Vibration Monitoring Framework

The Construction Noise and Vibration Management Plan shall establish a receptor-specific monitoring framework to verify compliance with applicable criteria, evaluate the effectiveness of mitigation measures, and support adaptive management during construction. Monitoring locations shall be selected with particular consideration given to sensitive receptors located closest to the works, including educational, healthcare, recreational and cultural heritage receptors. Monitoring requirements will be reviewed prior to the commencement of each major construction phase and adjusted, where necessary, to reflect construction methods, receptor proximity and predicted impact levels. Where assessment results indicate elevated vibration risk or increased uncertainty, real-time vibration monitoring may be implemented to provide continuous verification of compliance and enable rapid implementation of corrective measures should predefined trigger levels be exceeded. Any exceedance of monitoring

trigger levels will initiate investigation and corrective action, which may include modification of construction methods, installation of additional mitigation measures, revision of working hours, temporary work suspension, or implementation of enhanced community liaison procedures. All exceedances, complaints and corrective actions will be recorded and reported in accordance with the Project Environmental and Social Management System.

The monitoring framework shall be presented in the management plan in tabular form, identifying for each receptor the location, chainage, receptor type, monitoring parameter, applicable trigger level and monitoring frequency, and shall cover the sensitive receptors closest to the works. Sensitive receptors may include HRM-103 (Nizami Culture and Recreation Park), School No. 59 at 4 Khanlar Street and the Hospital of Neurosurgery at 4 Khudu Mammadov Street (further information can be found in Chapters 12 and 14 of the ESIA) with trigger levels derived from the noise and vibration criteria set out in Chapter 12 of the ESIA. An example approach is given in below table.

Construction noise and vibration monitoring shall be undertaken throughout the construction phase to verify the effectiveness of the mitigation measures and demonstrate compliance with the Project noise and vibration criteria. Where monitoring identifies an exceedance of the applicable trigger levels, the Contractor shall investigate the cause, implement appropriate corrective measures and undertake follow-up monitoring to confirm the effectiveness of the implemented mitigation. Monitoring results, corrective actions and any substantiated complaints shall be documented in the routine Environmental Monitoring Reports prepared in accordance with this section

The assessment shall be finalised by repeating the relevant analyses in accordance with the Contractor's proposed construction methodology, and the monitoring locations shall be selected accordingly. This table shall be reviewed and updated based on the Contractor's methods and equipment.

Table 12 Noise and Vibration Monitoring Framework (Indicative)

Phase	Monitoring Location	Receptor Type	Parameter Monitored	Monitoring Frequency	Trigger Level	Corrective Action	Reporting	Responsibility
Construction	Residential receptors closest to construction works	Residential	LAeq,T	Baseline before works (where required), during major construction activities and following substantiated complaints	Exceedance of the Project construction noise criteria	Review construction methods, inspect and maintain equipment, install temporary acoustic barriers, reschedule high-noise activities and implement additional site-specific mitigation measures	Included in routine Environmental Monitoring Reports. Exceedances and corrective actions shall be documented.	Contractor
Construction	Schools and other educational facilities	Educational	LAeq,T	During construction activities within the zone of influence and, where practicable, during sensitive school periods	Exceedance of applicable Project criteria	Restrict noisy activities during teaching hours, provide temporary noise control measures and coordinate works with facility management	Monthly Environmental Monitoring Report	Contractor
Construction	Healthcare facilities	Healthcare	LAeq,T	During construction works within the area of influence	Exceedance of applicable Project criteria	Modify work programme, install additional mitigation measures and minimise duration of noisy activities	Monthly Environmental Monitoring Report	Contractor
Construction	Receptors adjacent to compaction piling, and other vibration-generating activities	Residential / Sensitive Structures	Peak Particle Velocity (PPV)	Prior to commencement (where required) and during vibration-generating activities	Exceedance of the applicable Project vibration criterion	Review construction methodology, reduce vibration energy, modify equipment or working method and undertake repeat monitoring following implementation of mitigation	Daily monitoring records and monthly summaries	Contractor
Construction	Cultural heritage receptors (where applicable)	Cultural Heritage	Peak Particle Velocity (PPV)	During vibration-generating works within the influence area	Exceedance of the applicable Project criterion	Suspend works if necessary, review construction methodology and implement additional protection measures in consultation with the relevant authority	Immediate notification and inclusion in monitoring reports	Contractor

5.3 Operational Activities: Internal Monitoring

During the operational phase, monitoring and reporting are important to ensure the continued implementation of the ESMS; however, monitoring and reporting is typically less frequent than during the construction phase.

BM will undertake regular environmental, social and health & safety site visits. Notes from these site visits should be sent to the ESHS Manager.

BM should prepare a report at least every six months on the activities for the Lenders. The report should include the following information:

- Information on progress, main achievements and challenges.
- Progress in implementing the ESMS and the individual management plans.
- Incidents and accidents, number of staff working on site (including sub-contractors) and security/H&S statistics.
- Social activities and statistics on complaints received. This should also include information on the actions taken to address the complaints raised.
- Environment activities and statistics on environmental incidents. This should also include actions taken or measures to be put in place to address any non-compliance noted on site.
- List of sub-contractors.
- Update on programme of activities.
- Information on permits, quality assurance, other relevant contractual information.

Reviews of all the individual management plans will be undertaken by BM at least once per year, or if an event triggers the update of a management plan.

A register of all necessary external stakeholders, including regulatory reporting requirements, will be listed within the ESMS. The frequency of reporting, format and minimum content along with the person responsible will be contained in the register as agreed with Lenders.

BM will ensure that all the necessary reports are produced and submitted in a timely fashion in order to achieve on-going regulatory compliance throughout the life of the Project.

5.3.1 Environmental and Social Baseline Monitoring

BM should ensure all environmental and social monitoring requirements are met. The environmental and social monitoring will be agreed with the Lender and will include monitoring of the items described

in Table 13 and Table 14 (in addition to items identified as part of the project ESAP). This will ensure that the management measures that have been identified for the operation phase of the Project are working.

Where monitoring identifies exceedances in the standards that are being applied, then environment and social management measures need to be reviewed for their effectiveness. Changes would be made to these management measures or to construction practices to ensure compliance with the standards.

In addition, monitoring will be required to confirm compliance with permits/licence conditions, national regulations, and international guidance.

The ESMS will include full details of project monitoring requirements, including frequency and location.

Table 13 Construction Phase E&S Monitoring Plan

Topic	Monitoring Activity	Monitoring Description	Response to Non-Compliance	Location	Frequency and Duration	Responsibility
Labour and Working Conditions	Labour Performance Monitoring	Monthly monitoring of Contractor labour performance including all construction contractors. Monitoring will include:	Cease activities immediately when encountered following:	All construction sites	Monthly monitoring throughout construction phase	Responsible (R) – Contractor Verification (V) – Owner's Engineer Review and Approval (A) – Baku Metro
		• Workforce information • HR management • Grievance management • OHS management and risks control measures • Workers' accommodation management	• Child/forced labour • GBVH issues • Discrimination	Workers camp	Quarterly internal labour audits during construction phase	
					Annual external labour audits during construction phase	
Environmental Performance	Environmental Performance Monitoring	Monthly/quarterly monitoring of Contractor's environmental performance including:	Cease activities immediately when encountered following:	Construction site and settlements	Monthly internal monitoring throughout construction phase	R- Contractor V- Owner's Engineer A- Baku Metro
		• Air emissions • Noise and vibration • Blasting (if applicable) • Waste management • Water and wastewater management • Hazardous material management • Resource efficiency management	• Significant and material soil, groundwater and surface water pollution		Quarterly external audits during construction phase	

Topic	Monitoring Activity	Monitoring Description	Response to Non-Compliance	Location	Frequency and Duration	Responsibility
		- Emergency Preparedness and Response - Biodiversity related actions				
Environmental Performance / Waste	Waste Management Plan	Monthly monitoring of Contractor's WMP implementation, including KPI tracking per WMP Table 2: - Total waste generated by category (track & record) - Inert material diverted to reuse (target > 80%) - Non-hazardous waste diverted to recycling (target > 50%) - Hazardous waste non-conformances (target zero) - Monthly waste summary and annual waste report submission to MENR (100%) - Waste-related spill incidents (target zero) - Site personnel receiving waste training (100%) - Waste manifest/shipment reconciliation for hazardous waste (100% of shipments accounted for, weekly)	Immediate corrective action when: - Illegal disposal or unauthorised waste movement - Hazardous waste non-conformance or waste-related spill - Manifest/passport reconciliation gap for hazardous waste - Reuse or recycling diversion targets not met		Monthly internal monitoring (manifest reconciliation weekly) throughout construction phase; quarterly external audit	R- Contractor V- Owner's Engineer A- Baku Metro

Topic	Monitoring Activity	Monitoring Description	Response to Non-Compliance	Location	Frequency and Duration	Responsibility
		Waste manifest/passport compliance (100%) Waste register and disposal records maintained; permits/agreements for waste disposal/transfer in place				
Environmental Performance / Spoil	Spoil Disposal Management Plan	Monthly monitoring of Contractor's SDMP implementation, including: waste registration and testing; waste transport records for all spoil trucks; contaminated-material release and illegal dumping (zero); shipments rejected at the licensed facility gate (zero); haul-route, dust and uncovered-truck grievances; waste-disposal training; and spoil storage controls (covering, liner integrity, stabilisation pit, segregation by class).	Immediate corrective action on any unauthorised/illegal dumping or contaminated-material release, shipment rejection at the disposal facility, or stockpile liner/cover/containment failure.	Construction site	Weekly internal monitoring (training monthly) throughout construction	R- Contractor V- Owner's Engineer A- Baku Metro
Environmental Performance / Contaminated Land	Contaminated Land Assessment and Management Plan	Monitoring of Contractor's CLAMP implementation, including: pre-entry testing of new work areas and gas testing; gas-detection equipment calibration;	Immediate corrective action on any gas or exposure-limit exceedance, LEL $\geq$ 40% during TBM/shaft works, uncontrolled Class B/C release, or unauthorised	TBM drive faces, NATM headings and deep open-cut / shaft excavations (Y-14 to Y-17); contaminated-soil handling areas	Before excavation (area testing); daily (gas testing, calibration, entry control); weekly (exceedance review);	R- Contractor V- Owner's Engineer A- Baku Metro

Topic	Monitoring Activity	Monitoring Description	Response to Non-Compliance	Location	Frequency and Duration	Responsibility
		control of unauthorised entry without atmospheric testing; gas and occupational exposure-limit exceedances (corrective action for all); uncontrolled release or dumping of Class B/C material (zero); LEL exceedances $\geq 40\%$ during TBM/shaft works (zero); and training of personnel in contaminated areas.	entry without atmospheric testing.		continuous/real-time (atmospheric monitoring during TBM/shaft works); training monthly; throughout construction	
Health and Safety Performance	Occupational Health and Safety Monitoring	Monthly/quarterly monitoring of Contractor's health and safety performance including: - OHS risks - Community Health and Safety risks Monthly OHS performance KPIs, reported by Owner's Engineer to BM PIU, including as a minimum: - Total Number of Employees (Contractor / Subcontractors); Total Man-Hours; Total Driven Kilometres	Cease activities immediately when encountered following: - Unresearched and unreported work accidents leading to death, loss of limb and/or loss of workdays - Publicly known (media announced) grievances which are not followed/not responded by Contractor related to	Construction site	Monthly internal monitoring throughout construction phase	R- Contractor V- Owner's Engineer A- Baku Metro
	Community Health and Safety Monitoring				Quarterly external audits during construction phase	

Topic	Monitoring Activity	Monitoring Description	Response to Non-Compliance	Location	Frequency and Duration	Responsibility
		- Lost-Time Injury Frequency Rate (LTIFR); Total Recordable Injury Frequency Rate (TRIFR); Accident Severity Rate (ASR); Road Accident Rate - Number of: Near Misses; First-Aid Injuries; Injuries Requiring Medical Treatment; Injuries Resulting in Lost Workdays; Fatal Accidents; Total Reportable Accidents; Road / Traffic Accidents; Accidents Resulting in Property Damage; Occupational Diseases; Lost Workdays - Incidents Involving Third Parties - NCR Actions Initiated; NCR Actions Closed; Monthly NCR Action Closure Rate	- dust, emission and vibration issues - Incidents leading to media announced public nuisance and/or material issues - Immediate stop-work by Contractor H&S Manager or Owner's Engineer OHS expert upon identification of imminent risk to worker safety; - all existing work permits for affected area to be revoked; - work permits to be reissued only after documented confirmation that precautionary measures have been implemented			

Topic	Monitoring Activity	Monitoring Description	Response to Non-Compliance	Location	Frequency and Duration	Responsibility
		- Amount of OHS Fines Imposed (Euro equivalent) - Number of Emergency Drills Conducted - Number of Onboarding and Orientation Trainings Conducted; Number of Employees Who Participated; Total Man-Hours of Onboarding and Orientation Trainings; Total Man-Hours of Toolbox Talks; Total Man-Hours of Job-Specific OHS Training; OHS Training Man-Hours Per Person - Owner's Engineer OHS expert minimum site presence ratio (days per week per active construction front), with increased frequency during peak construction periods and high-risk operations (TBM drives, shaft excavation, station fit-				

Topic	Monitoring Activity	Monitoring Description	Response to Non-Compliance	Location	Frequency and Duration	Responsibility
		out); presence ratio reported monthly to BM PIU Contractor HSE site audit frequency: minimum weekly site audits by Contractor HSE team per active construction front				
Health and Safety	High-Risk Activity & Permit-to-Work Compliance Monitoring	Monthly monitoring of Contractor compliance with the PTW system and activity-specific controls for high-risk tasks: % of high-risk activities (work at height, electrical / live-line, confined-space entry incl. TBM cutter head, deep excavation & pile driving, lifting & crane, TBM disc & segment, demolition) covered by valid PTW (target 100%); - LOTO for all electrical isolation; lifting plan & crane/wire-rope inspection records	Immediate stop-work by Contractor H&S Manager or OHS expert where a high-risk activity proceeds without valid PTW, where atmospheric monitoring / gas alarms are absent or non-functional, or where lifting / fall-protection / LOTO controls are missing; permits revoked, reissued only after documented restoration of controls.	All active construction sites and work-fronts	Monthly internal monitoring throughout construction; quarterly external audit	R- Contractor V- Owner's Engineer A- Baku Metro

Topic	Monitoring Activity	Monitoring Description	Response to Non-Compliance	Location	Frequency and Duration	Responsibility
		(numbered equipment, operating-hour logs, pre-use checks per ISO 4308); - fall/edge protection at height; confined-space atmospheric monitoring (CH₄, O₂, H₂S, CO, CO₂, VOC, LEL); - deep-excavation geo-mechanical instrumentation & shoring inspections; - night-work / lone-working risk assessments & fatigue management. JSA per high-risk task, linked to PTW forms				
Health and Safety	Asbestos & Hazardous Materials Monitoring	Monitoring of asbestos / hazardous-material controls before and during demolition and excavation: PDAS completed by certified specialist before demolition (target 100% of buildings at Y-16, Y-17 and other affected sites);	Immediate stop-work where demolition / excavation proceeds without completed PDAS / ACM screening, or where ACMs are disturbed without approved AMP and licensed subcontractor;	Demolition and excavation areas	Prior to demolition/excavation; throughout works at affected sites	R- Contractor V- Owner's Engineer A- Baku Metro

Topic	Monitoring Activity	Monitoring Description	Response to Non-Compliance	Location	Frequency and Duration	Responsibility
		- pre-excavation ACM screening at Y-16 before excavation; - AMP prepared & implemented where ACMs identified; - licensed subcontractor engaged, with worker training, RPE face-fit testing, controlled-wetting / decontamination and sterile-zone provisions; - asbestos waste to licensed site with consignment records; air-clearance records after removal.	area isolated and clearance re-tested before works resume.			
Health and Safety	Emergency Drill and Response Monitoring	Monitoring of Contractor's emergency preparedness and response performance against the full EPRP scenario set: - tunnel collapse/face instability; - groundwater inflow/flooding; - fire/smoke in tunnel, station excavation, TBM,	Immediate review and corrective action when: - emergency drill completion falls below quarterly minimum; - any EPRP scenario remains untested for more than 12 months; - multi-agency coordination protocol not in place by	Construction sites and adjacent operational stations within influence zone	Monthly internal monitoring throughout construction phase; quarterly reporting to AIIB; quarterly external audit verification of drill records	R- Contractor V- Owner's Engineer A- Baku Metro

Topic	Monitoring Activity	Monitoring Description	Response to Non-Compliance	Location	Frequency and Duration	Responsibility
		or surface compound; contaminated gas release; - retaining wall/deep excavation collapse; - third-party building damage requiring evacuation; power failure affecting ventilation, signalling, or dewatering Monitoring shall include: - number of emergency drills completed vs. planned (target: ≥ 1 practical exercise per quarter; all scenarios tested at least once within each 12-month cycle); - drill response-time measurements and progressive improvement trend; - lessons-learned actions documented and closed out; - status of multi-agency coordination protocol with MES, city fire services, ambulance services, traffic police, and BCEP (target: signed and in place prior	construction commencement; building evacuation triggered without prior notification chain activation			

Topic	Monitoring Activity	Monitoring Description	Response to Non-Compliance	Location	Frequency and Duration	Responsibility
		to construction commencement, tested through drill programme); - EPRP scenario coverage (target: 100% of scenarios with documented response procedures, notification chains, and designated hospitals); - building vibration monitoring exceedances triggering evacuation procedures and notification chain activation; community emergency communication incidents and response effectiveness.				
Health and Safety	Security Management	Monitoring of Contractor's implementation of the Security Risk Management Plan (SRMP) against the requirements of AIIB..Monitoring shall include: - Incident Rate (security-related incidents per month); - Training Completion rate for security personnel;	Immediate review and corrective action when: - security incident rate exceeds agreed threshold; - vetting or training records are incomplete or non-compliant; - security-related grievance remains	Construction sites, contractor camps, and project-affected areas	Monthly internal monitoring throughout construction phase; periodic reporting to AIIB; quarterly external audit verification of security records	R- Contractor V- Owner's Engineer A- Baku Metro

Topic	Monitoring Activity	Monitoring Description	Response to Non-Compliance	Location	Frequency and Duration	Responsibility
		- Vetting Compliance records for hired security personnel; - Number of security-related grievances received and resolved; Response time to security incidents.	unresolved beyond GRM timelines; SRMP not submitted or approved prior to commencement of works.			
Health and Safety	Traffic Management Plan	Monthly monitoring of Contractor's TMP implementation including: - KPI tracking per TMP Table 5-1 (accidents, near-misses, vehicle compliance, driver compliance, training, audits, road damage, community complaints, grievance response time, driver hours/rest period violations, speeding incidents, mobile phone usage violations, haul-route deviations) - GPS/fleet management system compliance	Immediate corrective action when: - traffic fatality or serious injury involving third party; - monthly community complaint threshold exceeded (>3 traffic-related grievances); GPS/speed limiter non-compliance identified	All construction sites (Y-14 to Y-17); designated haulage and spoil disposal routes	Monthly internal monitoring throughout construction phase; monthly road safety field audit; quarterly external audit	R- Contractor V- Owner's Engineer A- Baku Metro

Topic	Monitoring Activity	Monitoring Description	Response to Non-Compliance	Location	Frequency and Duration	Responsibility
		- Road condition survey records (haulage and waste routes) - Monthly road safety field audits (signage, speed compliance, pedestrian separation) - atioJourney road risk assessment status for construction–waste site routes Traffic-related grievances registered in Project GRM; linkage to SEP community reporting channels				
Climate	Worker Heat Stress & Thermal Conditions	Ambient air temperature recorded on site. Worker exposure assessed against occupational heat stress thresholds. Readings logged in the construction HSE register.	Where thresholds are exceeded: enforce rest/shade/hydration regime, shift works to cooler hours. Heat-related incidents reported to the ESHS Manager.	All active construction sites	During summer periods	R- Contractor V- Owner's Engineer A– Baku Metro
Social	Accessibility Compliance Monitoring	Monitoring of accessibility and universal-access performance during design and construction: new stations (Y-14 to Y-17) compliant with applicable accessibility and universal design requirements at	- Halt or correct non-compliant design before approval; - restore interim accessible routes before primary route is restricted;	New stations (Y-14 to Y-17); all stations affected by construction/modernization works	Design compliance: at each design review milestone and prior to construction;	R- Contractor V- Owner's Engineer A– Baku Metro

Topic	Monitoring Activity	Monitoring Description	Response to Non-Compliance	Location	Frequency and Duration	Responsibility
		each design review milestone (target 100%); - design-stage accessibility review completed prior to construction (100% of new stations); - interim accessible routes / alternative assisted-access maintained at stations affected by works (100% of affected stations); - accessibility-related corrective actions implemented (100% within agreed timeframe); - accessibility-related grievances received and resolved (100% recorded and responded to); consultations with disability organizations / user groups (at least 1 per year).	escalate unresolved accessibility grievances; reschedule missed consultations		- interim routes: continuous during works; - corrective actions and grievances: quarterly; user-group consultation: annually	

Table 14 Operation Phase E&S Monitoring Plan

Topic	Monitoring Activity	Monitoring Description	Response to Non-Compliance	Location	Frequency and Duration	Responsible Party
Labour and Working Conditions	Labour Performance Monitoring	Internal labour performance audits. Monitoring will include: - Workforce information - HR management - Grievance management - OHS management and risks control measures Welfare facilities management	Cease activities immediately when encountered following: - GBVH issues - Discrimination	Project site	Internal Labour Audits: Biannual in the first two years Annual in the second two year-period External Labour Audits: Once in every three years	BM
Health, Safety, and Emergency Preparedness	Occupational Health and Safety Monitoring, Community Health and Safety Monitoring, Emergency Preparedness Monitoring	Monitoring of BM's operational health, safety, and emergency preparedness performance including: - LTIFR, TRIFR, and Accident Severity Rate; - near-miss reporting; passenger incident tracking (falls, crush injuries, security incidents); - emergency drill completion vs. planned (target: ≥ 1 per quarter, ≥ 1 full-scale exercise per year with MES coordination); - annual top-table exercise covering worst-case scenarios (earthquake,	Immediate review and corrective action when: - any fatality or serious injury occurs; - emergency drill completion falls below quarterly minimum or annual full-scale exercise is not conducted; - SOS functionality falls below 100%; life and fire safety assessment not completed within required timeframe	All operational stations and tunnels (existing network and Green Line extension)	Monthly internal monitoring; quarterly reporting to AIIB; annual top-table exercise; semiannual external audit in first two years, annual thereafter	BM

Topic	Monitoring Activity	Monitoring Description	Response to Non-Compliance	Location	Frequency and Duration	Responsible Party
		combined tunnel collapse + flooding, business continuity); • % of SOS units tested and confirmed functional (target: 100%); • % of stations with compliant accessible emergency signage (target: 100%); • % of station/operations staff trained in emergency and assisted evacuation (target: 100%, annual refresher); • status of life and fire safety assessment including NFPA 130 compliance confirmation; flood vulnerability inventory of station tunnels and integration into EPRP; community emergency communication protocol status (multilingual PA, accessible audio, SMS/app-based alerts where feasible)				
Health and Safety / Traffic	Operational Traffic Management	Monthly monitoring of operational-phase traffic performance per the TMP,	Corrective action when: any traffic fatality or serious injury; overcrowding at station	All operational Green Line stations (Y-14	Monthly internal monitoring; cumulative traffic impact assessment	BM (Operations); Owner's Engineer to monitor

Topic	Monitoring Activity	Monitoring Description	Response to Non-Compliance	Location	Frequency and Duration	Responsible Party
		including: station-related traffic accidents and near-misses (target zero fatalities; all near-misses reported); speeding and mobile-phone-use violations by Baku Metro operational vehicles via GPS/fleet records (target zero); passenger flow and crowd management at station entrances, exits and escalators during peak periods; taxi, ride-share, kiss-and-drop and bus-interchange zone compliance; traffic-related community complaints and grievance response time per Project GRM; cumulative surface-traffic impact assessment on adjacent streets after revenue service, coordinated with BCEA.	accesses; community complaint threshold exceeded; GPS/speed non-compliance by operational vehicles; capacity/safety concern identified in the BCEA-coordinated assessment.	to Y-17) and the adjacent road network	after revenue service; annual external audit	
Social	Accessibility and Universal Access	Monitoring of station accessibility and universal-access performance against defined targets: new stations compliant with applicable accessibility and universal design requirements — 100% (Operations Management);	- Identify and rectify non-compliant or non-functional accessibility provisions; - restore accessible routes/equipment to ≥95% availability; - escalate unresolved accessibility grievances;	All operational stations; new stations (Y-14 to Y-17)	- New-station compliance: prior to operation and annually; - accessibility audits: prior to operation and every 2 years; - corrective actions and grievances: quarterly;	- BM (Operations Management; Operations & Maintenance Unit); - Grievance Management Unit; - HR / Training Unit;

Topic	Monitoring Activity	Monitoring Description	Response to Non-Compliance	Location	Frequency and Duration	Responsible Party
		- accessibility audits completed — 100% of stations (Operations Management); - accessibility-related corrective actions implemented — 100% within agreed timeframe (Relevant Departments); - availability of elevators, ramps and accessible routes — ≥95% operational availability (Operations & Maintenance Unit); - passenger information systems providing visual and audible announcements — 100% of stations (Operations & Maintenance Unit); - accessibility-related grievances received and resolved — 100% recorded and responded to (Grievance Management Unit); - staff trained on assisting passengers with disabilities and reduced mobility — 100% of	reschedule missed audits/training		equipment/route availability and information systems: monthly; staff training, satisfaction survey and user-group consultation: annually	Customer Relations Unit; Stakeholder Engagement Team; Owner's Engineer to monitor

Topic	Monitoring Activity	Monitoring Description	Response to Non-Compliance	Location	Frequency and Duration	Responsible Party
		customer-facing staff (HR / Training Unit); satisfaction of passengers with disabilities and reduced mobility — increasing trend / minimum 80% (Customer Relations Unit); consultations with disability organizations / user groups — at least 1 per year (Stakeholder Engagement Team).				
Climate Change	Thermal Stress on Infrastructure & Energy Demand	Monitoring of station temperature/humidity and cooling system performance via SCADA Temperature and humidity sensors integrated with SCADA for real-time monitoring. Mechanical cooling performance (energy use, cooling capacity, fault logs) reviewed against design thresholds.	If internal temperatures exceed comfort/safety thresholds, extend night-time pre-cooling; and engage maintenance based on operational thresholds.	All underground stations, plant rooms, concourses and passenger areas	Weekly during the summer periods Real-time monitoring	BM; Metro Operator Facility Management, ESHS team
Climate Change	Flash Flood Ingress from Extreme Rainfall	- Monitoring of automatic flood gate functionality and drainage performance - Flood gate sensors/actuation tested periodically;	- On threshold alert, automatic flood gates close per protocol; - If actuation failure, manual closure and maintenance notification;	Station entrance portals, ventilation shafts, underground access points,	Throughout operation	BM, ESHS team

Topic	Monitoring Activity	Monitoring Description	Response to Non-Compliance	Location	Frequency and Duration	Responsible Party
		Station sumps and pumps inspected for capacity/blockage; Inundation events logged.	flooding incidents reported to ESM/authority within 24 h; post-event structural inspection before reopening.	surface drainage		

5.4 Independent Auditing

BM shall commission and fund independent environmental and social audits of the Project throughout the construction and operational phases. The audits shall be undertaken by suitably qualified and independent environmental and/or social experts in accordance with the requirements of the AIIB Environmental and Social Framework (ESF) and the Project ESMS. Independent audits shall be conducted quarterly throughout the construction phase and every six months during the first three years of operation, unless otherwise agreed with AIIB or required by applicable legislation. The audit findings shall be submitted to BM and AIIB, together with corrective actions and agreed implementation timeframes.

The key objectives of the independent audits will be as follows:

- The practical implementation of the ESMP and ESMS, including progress since the previous visit/review; and
- Feasible improvement objectives for completion before the next visit/review.

These audits will be used to re-examine the continued appropriateness of the ESMP and ESMS, and also to provide advice on any updates required. Attention will be given to lessons learnt in the light of experience. In particular, consideration will be given to the implementation of the management plans and monitoring programmes.

These audits will consider all the environmental health and safety issues that form part of the ESMP and ESMS in both construction and operation phases. Of likely particular importance will be:

- Solid Waste management;
- Storage of chemicals and hazardous materials;
- Air quality;
- Noise and vibration;
- Groundwater monitoring.
- Stormwater and wastewater
- Energy and water consumption
- Physical hazards (moving equipment, strains, weather elements)
- Chemical Hazards
- Life and Fire Safety in areas accessible to public

Auditing social issues will also be important, especially regarding labour rights and working conditions, worker accommodation conditions, occupational health and safety, GBVH and grievances. The audit will need to verify that the Project commitments to worker's rights are implemented, with particular regards to:

- Use of child labour;
- Payment of minimum wages and overtime;

- Right of association and their right to organise and bargain collectively; communication of these and not preventing/retaliating when using rights,
- Ensuring no workers are charged fees to gain employment on the Project;
- Implementation of plans, procedures and training for occupational health and safety;
- Non-discrimination and equal opportunity; providing safe working environment for women
- Awareness raising on and prevention of GBVH
- Functioning and efficient labour grievance mechanism;
- The existence of human resource policies, job descriptions, written contracts;
- Provision of information to labour force regarding rights and working conditions; and
- Sufficiency of employee training activities.
- Dedicated and comprehensive labour rights and working conditions, OHS audit at the peak of construction

Auditing social issues will include other social issues on:

- Development and implementation of RAP, management of grievances on RAP,
- Delivery of SEP, meaningful engagement of stakeholders and management of grievances effectively,
- Delivery of gender smart actions and GBVH measures identified in ESAP and ESMS.

6. Emergency Preparedness and Incident Management

6.1 Emergency Preparedness and Response

6.1.1 Overview

This section sets out the framework for emergency preparedness and response during the construction and operation phases. The detailed emergency scenarios, response protocols and mitigation measures are set out in Chapter 17 of the ESIA, in Table 9 of this ESMP and in the Occupational Health and Safety Plan and Community Health and Safety Plan.

The Contractor shall prepare an Emergency Preparedness and Response Plan (EPRP) covering all credible emergency scenarios arising from construction activities and shall submit it to the Owner's Engineer for review and to BM for approval before commencement of works. BM shall prepare and maintain an equivalent EPRP for the operation phase before commissioning. The EPRP is distinct from the Emergency Accessibility Action Plan, which addresses assisted evacuation and accessible egress for persons with disabilities and other vulnerable users and is prepared separately.

The EPRP is a single, integrated plan covering both occupational emergencies affecting the workforce and community emergencies affecting members of the public, adjacent building occupants, road users and metro passengers. A single emergency organisation and command structure applies to both, on the basis that credible worst-case scenarios such as tunnel collapse, TBM gas release, surface sinkholes and fire affect workers and the public simultaneously. Worker-side preparedness measures are detailed in the Occupational Health and Safety Plan and community-side measures in the Community Health and Safety Plan; the EPRP governs the response to an emergency once it occurs.

6.1.2 Emergency Organisation and Responsibilities

The EPRP shall define a single emergency organisation for the Project, identifying the Emergency Response Coordinator, the site emergency response team, first aiders, fire wardens and the persons authorised to declare an emergency, order an evacuation and stand down an emergency. The Contractor is responsible for emergency response on and adjacent to its worksites, including the safety of members of the public affected by its activities. The Owner's Engineer verifies the adequacy of the EPRP and its implementation. BM retains overall accountability, including for emergencies affecting the operating metro network and for interfaces between construction works and live operations. Responsibilities shall be assigned by post, not by name, and shall provide continuity across all shifts, including night works.

6.1.3 Communication Procedures

The EPRP shall set out an emergency communication procedure identifying the internal alarm and notification chain, the 24-hour emergency contact numbers for each worksite, the sequence and timing

of notifications to the Owner's Engineer, BM and the external emergency services, and the arrangements for informing affected communities, adjacent building occupants and metro passengers. Emergency contact details shall be displayed at each worksite and reviewed monthly. Communication with affected communities shall be consistent with the Stakeholder Engagement Plan, and the grievance mechanism shall not be used as a substitute for emergency notification.

6.1.4 Coordination with Emergency Services

The EPRP shall be developed in coordination with the Ministry of Emergency Situations (MES) and, where relevant, with the local fire, ambulance, police and utility emergency services, and shall record the agreed interface arrangements, including site access routes, assembly points, muster arrangements and the handover of on-site command to the external services on arrival. A tripartite coordination protocol between the Contractor, BM and MES shall be established and maintained throughout construction. The EPRP shall list the nearest hospitals and the relevant specialised hospitals for each worksite, as required under Table 9.

6.1.5 Evacuation and Rescue

The EPRP shall define evacuation and rescue arrangements for each worksite, including underground works, and shall address as a minimum: escape routes and refuge arrangements for tunnels and shafts; personnel tracking and roll call; rescue of injured or trapped persons; confined space and high-angle rescue capability; and evacuation of adjacent buildings and of members of the public where required under credible worst-case scenarios. Evacuation of persons with disabilities and other vulnerable users shall be addressed in the Emergency Accessibility Action Plan.

6.1.6 Emergency Drills

Emergency drills shall be conducted to test the credible worst-case scenarios identified in the EPRP. As a minimum, one practical exercise shall be conducted each quarter, and all scenarios identified in the EPRP shall be tested within each rolling twelve-month period. Drills shall be planned, observed and recorded, and drill records shall be made available to the Owner's Engineer and BM.

6.1.7 Post-Event Review

Following every emergency, and following every drill, a post-event review shall be undertaken to assess the adequacy of the response, the effectiveness of the communication chain and the performance of emergency equipment. The findings shall be recorded, corrective actions assigned with responsible parties and deadlines, and the EPRP updated accordingly. Emergencies involving injury, fatality, damage to third-party property or impacts on the public are additionally managed as incidents under Section 6.2.

6.2 Incident and Accident Management

6.2.1 Overview

This section sets out the framework for the classification, notification, investigation, reporting and recording of environmental, social, health and safety incidents and accidents. It applies to BM, the Owner's Engineer, the Contractor and all subcontractors, and covers incidents affecting workers, members of the public, third-party property, the environment and cultural heritage, including gender-based violence and harassment.

6.2.2 Incident Classification

The Contractor shall establish an incident classification system in its ESMS, agreed with the Owner's Engineer and BM before commencement of works, distinguishing as a minimum: near misses; minor incidents; serious incidents; and fatal or high-potential (Level 4) incidents, being those which have, or are likely to have, a significant adverse effect on the environment, affected communities, the public or workers. Classification determines the applicable notification, investigation and reporting requirements set out below. Near misses shall be reported and recorded, and their reporting shall not be discouraged or penalised.

6.2.3 Notification Procedures and Responsibilities

All incidents shall be reported immediately by the person discovering them to the Contractor's ESHS Manager, who shall notify the Owner's Engineer and BM. For fatal and high-potential (Level 4) incidents, BM shall promptly notify AIB through a flash report within 24 hours of learning of the incident, shall submit a detailed incident report no later than 72 hours after the incident, and shall submit a root cause analysis report within seven days of the incident, as required under Table 9. National reporting obligations to the relevant authorities shall be discharged in parallel and are not replaced by the requirements of this section. The Contractor and the Owner's Engineer shall provide BM with the information required to meet these deadlines.

6.2.4 Investigation and Root Cause Analysis

Every incident shall be investigated proportionately to its actual and potential severity. The Contractor investigates incidents arising from its activities; the Owner's Engineer reviews and verifies each investigation; and BM may require an independent investigation for fatal, high-potential or repeated incidents. Investigations shall be led by a competent person who was not directly involved in the incident, shall be evidence-based, and shall use a recognised root cause analysis methodology to identify the underlying organisational, procedural and management-system causes rather than attributing the incident solely to individual behaviour. The site or asset concerned shall be preserved until released by the investigating party and the relevant authorities.

6.2.5 Corrective Actions

Each investigation shall result in corrective actions, each with a responsible party and a completion deadline, recorded in a corrective action register. Close-out is subject to verification by the Owner's Engineer and approval by BM in accordance with Section 2. Where an investigation identifies a shortcoming in this ESMP, the C-ESMP, a management plan, a method statement or the EPRP, the relevant document shall be revised and the change communicated to the workforce and, where relevant, to affected communities. Corrective actions arising from incidents shall be tracked to completion in the monthly reports.

6.2.6 Reporting

Incident statistics shall be reported in the Contractor's monthly report and consolidated in BM's quarterly report to AIB, in accordance with Section 5. Reported indicators shall include, as a minimum, the number of incidents by classification, near misses reported, LTIFR, TRIFR, accident severity rate, incidents involving third parties, and the status of corrective actions.

6.2.7 Record Keeping

The Contractor shall maintain an incident register recording, for each incident, the date, time, location, classification, persons and parties involved, immediate actions taken, investigation findings, root causes, corrective actions and close-out status. Records shall be retained for the duration of the Project and transferred to BM at handover. Records concerning gender-based violence and harassment shall be maintained separately, on a strictly confidential and survivor-centred basis, with access restricted to designated personnel, and shall be reported only in aggregate form

Appendix A ESMP Deliverables Checklist

This appendix consolidates the deliverables required under this ESMP into a single checklist by implementation milestone. It is a compliance tracking tool; the content requirements for each deliverable are set out in Section 4, Table 6, Table 7, Table 8 and the associated measures in Table 9.

Deliverable	Responsibility	Milestone	✓
Project preparation			
ES requirements incorporated into the Project Operations Manual	BM	Before project effectiveness	☐
ESHS requirements, ESAP commitments and minimum ESHS staffing incorporated into the tender documents	BM	Before bidding	☐
ESHS requirements and ESAP commitments incorporated into the Owner's Engineer terms of reference	BM	Before bidding	☐
Strategic institutional E&S capacity assessment	BM	Within 30 days of Project effectiveness	☐
BM PIU ESHS team established	BM	Within 90 days of Project effectiveness and at least 60 days before issuing the first procurement order	☐
Owner's Engineer ESHS team mobilised	Owner's Engineer	Before commencement of works	☐
Corporate E&S policy, ESHS management system and ES permit register	BM	Within 30 days of Project effectiveness	☐
Two-tier Project Grievance Redress Mechanism adopted and publicly disclosed	BM	Before Project effectiveness	☐
Worker Grievance Mechanism established	Contractor	Immediately after Contractor is selected	☐
Corporate GBVH – SEA/SH policy	BM	Before commencement of works	☐
Independent Third-Party Validation consultant appointed	BM	Before commencement of works	☐
Permits, No Objection Certificates and approvals obtained	BM	Before commencement of works	☐
RAP commitments fulfilled and land access confirmed	BM	Before commencement of works	☐
Contractor management plans and studies			
Contractor ESHS organisational structure and appointed specialists in place	Contractor	Before commencement of works	☐

Deliverable	Responsibility	Milestone	✓
Construction Environmental and Social Management Plan (C-ESMP) including risk analysis	Contractor	Before commencement of works	☐
Labour Management Plan	Contractor	Before commencement of works	☐
Worker Accommodation Plan	Contractor	Before commencement of works	☐
Code of Conduct	Contractor	Before commencement of works	☐
Grievance Management Procedure	Contractor	Before commencement of works	☐
GBVH Policy and Gender Action Plan	Contractor	Before commencement of works	☐
Supply Chain Monitoring Procedure	Contractor	Before commencement of works	☐
Security Management Plan and Security Risk Management Plan	Contractor	Before commencement of works	☐
Emergency Preparedness and Response Plan (EPRP)	Contractor	Before commencement of works	☐
Occupational Health and Safety Plan	Contractor	Before commencement of works	☐
Community Health and Safety Plan, including Universal Access Action Plan and Emergency Accessibility Action Plan	Contractor	Before commencement of works	☐
Traffic Management Plan	Contractor	Before commencement of works	☐
Waste Management Plan	Contractor	Before commencement of works	☐
Spoil Disposal Management Plan	Contractor	Before commencement of works	☐
Contaminated Land Assessment and Management Plan	Contractor	Before commencement of works	☐
Noise modelling report	Contractor	Before commencement of works	☐
Y-15 site-specific HSE Plan	Contractor	Before commencement of works	☐
Cultural Heritage Management Plan including Chance Find Procedure	Contractor	Before commencement of works	☐
Air Quality Management Plan and Dust Management Plan	Contractor	Before commencement of works	☐
Noise and Vibration Management Plan	Contractor	Before commencement of works	☐
Water and Wastewater Management Plan	Contractor	Before commencement of works	☐
Hazardous Materials Management Plan	Contractor	Before commencement of works	☐
Lifting Management Plan	Contractor	Before commencement of works	☐
Permit-to-work system established	Contractor	Before commencement of works	☐
Pre-construction building condition surveys	Contractor	Before commencement of works	☐

Deliverable	Responsibility	Milestone	✓
Pre-construction noise and vibration baseline monitoring	Contractor	Before commencement of works	☐
Groundwater modelling study	Contractor	Before commencement of works	☐
Traffic capacity study	Contractor	Before commencement of works	☐
Activity-specific deliverables			
Asbestos Management Plan and pre-demolition asbestos surveys (PDAS)	Contractor	Prior to commencement of the relevant works	☐
Station Level Interim Accessibility Management Sub-Plan for each affected station	Contractor	Prior to commencement of the relevant works	☐
Site-specific vegetation removal plan and Ecological Clerk of Works appointed	Contractor	Prior to commencement of the relevant works	☐
Method statements for high-risk activities	Contractor	Prior to commencement of the relevant works	☐
Building condition surveys for structures within the zone of influence	Contractor	Prior to commencement of the relevant works	☐
During construction			
Monthly E&S monitoring report	Contractor	Within 7 days of month end	☐
Review and verification of Contractor monitoring data and reports	Owner's Engineer	Monthly	☐
Labour and working conditions audit	Owner's Engineer	Quarterly	☐
Quarterly E&S progress report to AIIB	BM	Within 15 days of quarter end	☐
Incident notification, investigation and root cause analysis reports	Contractor	Per Section 6.2	☐
Flash report, detailed incident report and root cause analysis to AIIB for fatal and Level 4 incidents	BM	24 hours / 72 hours / 7 days	☐
Non-conformances issued and corrective actions closed out	Owner's Engineer	Within the timeframe stated in the NCR	☐
Emergency drills conducted and recorded	Contractor	Quarterly	☐
Independent third-party monitoring and audit	BM	Before commencement of works; biannual reports throughout the Project lifecycle	☐
Training records maintained and available	Contractor	Maintained continuously; submitted with the monthly report	☐
Updated C-ESMP and management plans following design or method changes	Contractor	Within 30 days of the design or method change, and prior to commencement of the affected works	☐
Before commissioning			

Deliverable	Responsibility	Milestone	✓
Accessibility audit of new stations	BM	Before commissioning	☐

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