AUSTRIAN-GEORGIAN DEVELOPMENT

CCEH Caucasus Clean Energy Holding

Environmental and Social Management System

Owner of the ESMS

Lakhami HPP ESG Team

February 2026

Contents

1. Information about the HPP

"Austrian Georgian Development" LLC (AGD) was established in June 2013 and owns and operates hydropower projects in Georgia. The company developed the Lakhami HPP Cascade, consisting of Lakhami 1 and Lakhami 2 Hydropower Plants, located on the Lakhami River in Mestia Municipality. These run-of-the-river plants have a combined installed capacity of 16 MW and generate an average of 80 million kWh annually. The Lakhami HPPs are connected to the national grid via a 35/6 kV power transmission line.

"Austrian Georgian Development" LLC is co-owned by CCEH Hydro III LLC – Part of Caucasus Clean Energy Holding (CCEH), an international investment holding company founded in 2015, with investors from Western Europe and the United States, actively engaged in the Georgian energy sector. Geo Hydro Capital Group LLC – Founded in 2013, specializing in the development of small and medium-sized hydropower plants in Georgia. Energy Solutions LLC – Established in 2014, focusing on the construction and development of small and medium-sized hydropower plants, as well as providing consultancy services in the hydro energy sector.

This Code of Conduct is a guide for all employees and serves as a roadmap for navigating our business activities with integrity, ensuring that we consistently meet the expectations outlined by the company.

AGD LLC strives to make a positive impact on various fronts, including human rights, labor standards, environmental conservation, and the fight against corruption. These principles are not just lofty ideals but fundamental pillars upon which our company's mission and values are built.

2. Management Commitment / ESMS Policy

The management of the Lakhami HPP is committed to implementing and maintaining an effective Environmental and Social Management System (ESMS) that ensures compliance with Georgian legislation and alignment with IFC and EIB E&S Standards.

Lakhami HPP Management commits to:

a) Identifying, assessing, and managing environmental, social, and governance (ESG) risks and impacts associated with HPP activities.
b) Providing adequate resources, roles, and responsibilities for effective ESMS implementation.
c) Ensuring safe and responsible operations, protection of the environment, and respect for workers, communities, and other stakeholders.
d) Promoting continuous improvement of ESG performance throughout the HPP lifecycle.

This commitment applies to all employees, contractors, and subcontractors working on behalf of the Lakhami HPP.

3. Purpose of ESMS

The purpose of the ESMS is to provide a structured framework for identifying, managing, monitoring, and reporting environmental, social, H&S, and governance risks and impacts related to the Lakhami HPP.

The ESMS aims to:

a) Ensure legal and permit compliance.
b) Ensure compliance with IFC and EIB E&S standards.
c) Prevent incidents, accidents, and non-conformances.
d) Support informed decision-making and risk management.
e) Demonstrate responsible management to regulators, investors, shareholders and other stakeholders.

4. Scope

This ESMS applies to all activities of the Lakhami HPP, including operation, maintenance, and associated support functions.

The scope covers:

a) Environmental protection and biodiversity management.
b) Occupational H&S.
c) Labor and working conditions.
d) Contractor and subcontractor management.
e) Stakeholder engagement and grievance management.
f) Data management, monitoring, and reporting.

The ESMS applies to Lakhami HPP employees and all third parties working under the control or influence of the Lakhami HPP.

5. Introduction

This document describes ESMS established for the Lakhami HPP. It outlines the key principles, processes, and tools used to manage ESG risks and impacts in a consistent and systematic manner. The ESMS is designed to be practical, proportionate to the size and risk profile of the Lakhami HPP, and adaptable to changes in HPP activities, regulatory requirements, investors and stakeholder expectations. The ESMS supports responsible HPP operation and provides a basis for ongoing monitoring, reporting, and continuous improvement.

6. Roles and Responsibilities

Effective implementation of the ESMS requires clear definition of roles, responsibilities, authority, and accountability at all levels of the Lakhami HPP.

The ESMS roles and responsibilities framework ensures that ESG and H&S risks are properly identified, managed, monitored, and reported.

HPP Director

The HPP Director holds overall accountability for ESMS implementation and performance.

Responsibilities include:

a) Ensuring compliance with Georgian legal and permit requirements.
b) Ensuring alignment with applicable IFC and EIB E&S standards.
c) Approving ESMS policies, procedures, and key management plans.
d) Allocating adequate financial and human resources for ESMS implementation.
e) Reviewing ESG performance reports and ensuring corrective actions are implemented.
f) Escalating material ESG issues to CCEH and board of directors.

ESG Manager

The ESG Manager is responsible for day-to-day coordination and implementation of the ESMS.

Responsibilities include:

a) Identifying and assessing ESG risks and impacts.
b) Maintaining the ESMS documentation register.
c) Monitoring compliance with environmental and social permits and investors requirements.
d) Conducting site inspections and ESG supervision activities.
e) Managing stakeholder engagement and grievance mechanisms.
f) Coordinating reporting to management, investors, and authorities.
g) Supporting incident investigations and root cause analysis.
h) Monitoring implementation of corrective and preventive actions (CAPA).
i) Escalating material ESG issues to HPP Director an CCEH.

H&S Manager

The H&S Manager ensures safe working conditions across all HPP activities.

Responsibilities include:
a) Implementing the Occupational Health & Safety Management Plan.
b) Conducting regular H&S inspections and toolbox talks.
c) Ensuring incident and accident reporting and investigation.
d) Verifying contractor compliance with H&S requirements.
e) Monitoring safety performance indicators.
f) Coordinating emergency preparedness and response drills.

Operations Manager
The Operations Manager ensures that operational activities are conducted in accordance with ESMS requirements.
Responsibilities include:
a) Ensuring operational compliance with environmental flow requirements.
b) Supervising maintenance of fish ladders, sediment traps, and other mitigation measures.
c) Ensuring implementation of erosion control and slope stability measures.
d) Supporting data collection for monitoring and reporting.
e) Reporting operational risks or deviations to the ESG Manager and HPP Director.

Contractors and Subcontractors
Contractors and subcontractors are responsible for complying with ESMS requirements as defined in their contracts.
Responsibilities include:
a) Adhering to environmental, social, and H&S requirements.
b) Participating in site induction and required training.
c) Reporting incidents, accidents, and non-conformances immediately.
d) Implementing corrective actions within agreed timeframes.
e) Cooperating with monitoring, inspections, and audits.

All Employees
All employees of Lakhami HPP are responsible for:
a) Complying with ESMS procedures and policies.
b) Reporting unsafe conditions, environmental incidents, or grievances.
c) Participating in required training and awareness programs.

CCEH Oversight
Caucasus Clean Energy Holding (CCEH) provides strategic oversight and support to ensure ESMS alignment across the portfolio.
This includes:
a) Periodic review and audit of ESG performance.
c) Guidance on compliance with IFC and EIB E&S standards.
d) Escalation and management of material ESG and H&S risks.

Board of Directors
The Board of Directors of Lakhami HPP holds ultimate responsibility for oversight of the ESMS and overall ESG performance of the HPP.
The Board’s responsibilities include:
a) Approving the ESMS framework, policies, and strategic ESG objectives.
c) Providing oversight of material environmental, social, health and safety, and governance risks.
d) Ensuring that adequate resources (financial, human, and technical) are allocated for effective ESMS implementation.

e) Reviewing periodic ESG and H&S performance reports, including incidents, non-conformances, and corrective actions.
f) Ensuring timely escalation and management of significant ESG and H&s risks, incidents, or non-compliance.
g) Overseeing stakeholder-related risks that may affect the Company's reputation, license to operate, or investment value.
h) Supporting a culture of ethical conduct, accountability, and continuous improvement across the organization.

6.1 Organizational Chart

The Organizational Chart defines the management structure of Lakhami HPP and clearly illustrates reporting lines, functional responsibilities, and accountability for ESMS implementation.
The chart demonstrates how ESG and H&S responsibilities are integrated into the overall operational structure of the HPP. It clarifies the hierarchy between the Board, senior management, ESG and H&S responsible persons, technical and operational functions, and contractor oversight.
The Organizational Chart supports transparency, accountability, and effective communication across the Company and ensures that ESMS roles are formally embedded within the management system.
The Organizational Chart is presented in Annex # **1** to this document.

7. ESMS ESG Principles

The Lakhami HPP applies the following ESG principles to guide decision-making, risk management, and daily operations. These principles form the foundation of the ESMS and are applied across all HPP activities.

7.1 Environmental Principles

The HPP is committed to minimizing adverse environmental impacts and protecting natural resources by:

I. Complying with applicable environmental laws, permits, and conditions in Georgia.
II. Complying with applicable E&S standards of IFC and EIB.
III. Preventing pollution and minimizing emissions, waste generation, and resource consumption.
IV. Protecting biodiversity, habitats, and water resources, including implementation of mitigation and monitoring measures where required.
V. Applying the mitigation hierarchy (avoid, minimize, restore, offset) when managing environmental impacts.
VI. Responding promptly to environmental incidents and non-conformances.

7.2 Social Principles

The HPP promotes responsible social performance by:

I. Providing safe and healthy working conditions for employees, contractors and sub-contractors.
II. Respecting labour rights and fair working conditions in line with applicable legislation.
III. Managing contractors and sub-contractors performance through clear requirements and supervision.
IV. Engaging openly and transparently with affected communities and stakeholders.
V. Maintaining an accessible grievance mechanism and addressing complaints in a timely manner.

7.3 Governance Principles

The HPP ensures sound governance through:

I. Clear roles, responsibilities, and accountability for ESG management.
II. Ethical conduct, transparency, and compliance with internal policies and procedures.
III. Accurate data collection, documentation, and reporting.
IV. Regular monitoring, internal review, and corrective actions where required.

V. Continuous improvement of the ESMS based on performance, audits, and lessons learned.

8. Risk and Impact Identification

The Lakhami HPP identifies and assesses environmental, social, H&S and governance risks and impacts associated with its activities on a continuous basis.

Risk and impact identification is conducted:

a) During operation and maintenance activities.
b) When there are changes in activities, equipment, contractors, or regulatory requirements.
c) Following incidents, accidents, or significant near misses.
d) Based on stakeholder feedback and grievances.

Key risks and impacts considered include, but are not limited to:

a) Environmental impacts (e.g. water quality, biodiversity disturbance, waste, noise).
b) Occupational H&S risks.
c) Labor and working condition risks.
d) Community H&S impacts.
e) Compliance and reputational risks.

Identified risks and impacts are recorded, prioritized based on severity and likelihood, and managed through appropriate mitigation measures, monitoring, and corrective actions within the ESMS.

9. Management of Change

Lakhami HPP maintains a Management of Change (MoC) process to ensure that any planned or unplanned changes to activities, equipment, materials, personnel, contractors, schedules, or regulatory/permit conditions are assessed and managed in a controlled manner before implementation. The objective is to prevent new or increased environmental, social, H&S, security, and compliance risks and to ensure continued alignment with Georgian legal requirements and applicable IFC and EIB E&S Standards. Changes requiring MoC review may include, but are not limited to:

a) Modifications to the plant design, operational regime, or environmental flow arrangements.
b) Changes in key contractors/subcontractors or work methods.
c) Introduction of new hazardous materials or waste streams.
d) Works in sensitive areas (e.g., near waterways, slopes, or biodiversity-sensitive zones).
e) Changes to emergency arrangements or security arrangements.
f) Changes resulting from incidents, audit findings, or regulatory instructions.

All changes are documented and reviewed by the ESG Manager and relevant responsible persons (e.g., H&S Manager, Operations Manager) to determine the potential impacts, required mitigation measures, monitoring needs, training requirements, and any necessary updates to permits, management plans, procedures, and registers. Changes are implemented only after approval by the HPP Director (or delegated authority) and communication to affected stakeholders. Where required, the change and its risk controls are communicated to relevant authorities and investors.

Implementation is verified through follow-up inspections and monitoring, and any resulting actions are tracked through the CAPA Register until closure. Lessons learned from MoC are incorporated into ESMS documentation and training to support continuous improvement.

10. ESMS Documentation Type

The ESMS is supported by a structured set of documents that define how environmental, social, H&S, and governance risks are managed at the HPP. The documentation is designed to be practical, proportionate, and easy to maintain.

The ESMS documentation is grouped into the following types:

10.1 Plan

Plans define objectives, actions, responsibilities, and timelines for managing specific ESG risks and impacts. They describe *what* needs to be done and *how* it will be implemented.
Examples include environmental management plans, biodiversity action plans, and emergency response plans.

10.2 Procedure

Procedures describe standardized processes to ensure consistent implementation of ESMS requirements. They define *how* tasks are carried out and *who* is responsible.
Examples include incident reporting procedures, grievance management procedures, and contractor management procedures.

10.3 Survey

Surveys provide baseline and periodic assessments used to identify risks and monitor impacts. They support evidence-based decision-making and compliance with permit and investors requirements.
Examples include environmental monitoring surveys, biodiversity surveys, and social baseline assessments.

10.4 Monitoring

Monitoring documents define parameters, frequency, methods, and responsibilities for tracking ESG performance.
Monitoring results are used to verify compliance and effectiveness of mitigation measures.
Examples include water quality monitoring, OHS inspections, and environmental supervision records.

10.5 Databases and Logs

Databases and logs are used to record and track ESG-related data and events in a systematic manner. They ensure traceability, accountability, and availability of information for internal and external review.
Examples include incident and accident logs, training records, stakeholder engagement logs, and grievance registers.

10.6 Report

Reports summarize ESMS implementation, monitoring results, incidents, and corrective actions. They support internal management review and external reporting to regulators, investors, and other stakeholders.
Examples include internal ESG reports, monitoring summaries, and annual ESMS performance reports.

11. ESMS Documentation Register

The ESMS Documentation Register provides a consolidated list of all environmental, social, H&S and governance documents required for the effective implementation of the ESMS at the Lakhami HPP.
The register serves as a central reference that identifies:

a) The ESMS documents that the Lakhami HPP is required to have in place.
b) The document type (plan, procedure, survey, monitoring, database/log, or report).
c) The purpose of each document.
d) Responsible persons for preparation, implementation, and updates.
e) Document status, version control, and review frequency.

The Documentation Register ensures that all required ESMS documents are:

a) Clearly defined and consistently structured.

b) Up to date and aligned with legal, permit, and investors requirements.
c) Easily accessible for internal use, audits, inspections, and external reviews.

The register supports effective document control, avoids duplication, and helps ensure that ESG risks and impacts are managed in a systematic and transparent manner throughout the Lakhami HPP lifecycle.

11.1 Plans:

1) Waste Management Plan
2) Pollution Prevention Implementation Plan
3) Ecological Management Plan
4) Occupational H&S Management Plan
5) Community H&S and Security Plan
6) Erosion Control and Stabilization Plan
7) Emergency Preparedness and Response Plan
8) Community Liaison Implementation Plan
9) Stakeholder Engagement Plan (Grievance Mechanism and workers grievance mechanism)
10) Management of Changes Plan
11) Retrenchment Plan

11.2 Procedures:

1) Spill Response Procedure
2) Fish Pass Operation and Maintenance Procedure
3) Release on Minimal Environmental Flow Procedure
4) H&S Incident and Near-Miss Reporting Procedure
5) H&S Emergency Communication and Notification Procedure
6) Contractor Induction and ESG Compliance Procedure
7) Waste Handling and Disposal Procedure
8) Chance Find Procedure
9) Visitors' Induction Procedure
10) Code of Conduct
11) Suppliers Code of Conduct

11.3 Surveys:

1) Physical Parameters Survey (Winter and Summer Season)
2) Biodiversity Survey
3) Water Quality Monitoring Survey
4) Aquatic Biodiversity Survey
5) Geological Survey

11.4 Monitoring:

1) Noise Monitoring
2) Vibration Monitoring
3) OHTL ESG Monitoring

11.5 Databases and logs:

1) Permits Database
2) Social Projects Database
3) Environmental Mitigation Measures Database
4) Stakeholder Interaction Log
5) Grievance Log
6) Request Log
7) Incident log ESG (Environmental)
8) Incident, Accident and Near Miss Log H&S
9) NCR Log
10) Corrective and Preventive Action (CAPA) Register
11) Legal & Permit Compliance Register
12) Training Log
13) Audit Findings Register

11.6 Reports:

1) Weekly Report
2) Monthly Report
3) OHTL ESG Monitoring Report

12. Monitoring Routine

a) **Drip trays**
Inspection of drip trays to ensure correct placement, integrity, and absence of leakages or overflows.

b) **Septic tanks inspections**
Periodic inspection of septic tanks to verify proper functioning, structural integrity, and absence of leaks or overflows.

c) **Light bulbs**
Inspection and replacement of light bulbs to ensure adequate lighting for safety and operational needs, including proper disposal of used bulbs where applicable.

d) **Visits of Lakhami HPP power houses**
Coordination and documentation of regular site visits and inspections conducted jointly with H&S team and the local fire brigade/fire safety authorities when required.

e) **Access roads condition**
Inspection of access roads to assess surface condition, erosion, drainage, and overall suitability for safe operational access**.**

f) **Vegetation management (trees watering, vegetation cutting)**
Monitoring of vegetation maintenance activities, including tree watering and controlled vegetation cutting, to ensure site stability and compliance with environmental requirements.

g) **Erosion**
Monitoring of erosion-prone areas to identify early signs of soil loss and the effectiveness of erosion control measures.

h) **Landslide**
Monitoring of landslide-prone zones to detect early warning signs and ensure timely implementation of preventive measures.

i) **Minimum environmental flow**
Monitoring of minimum environmental flow to ensure continuous compliance with permit conditions and environmental requirements.

j) **Riverbed maintenance**
Monitoring of riverbed conditions to ensure that maintenance activities do not adversely affect hydraulic performance or ecological conditions.

k) **Fish / fish mortality monitoring**
Monitoring of fish populations and any fish mortality incidents to assess ecological impacts and effectiveness of mitigation measures.

l) **Fish ladder and fish ladder intake cleaning**
Regular inspection and cleaning of fish ladders to ensure unobstructed fish passage.

m) **Sediment traps / Desander**
Monitoring of sediment traps and desander performance to ensure effective sediment removal and proper maintenance.

n) **Sediment accumulations at intake**
Monitoring of sediment accumulation at the intake structure to ensure operational efficiency and timely sediment removal.

o) **Crack markers**
Monitoring of crack markers to track structural movement and identify any changes that may indicate stability issues.

p) **Rainwater channels**
Inspection and maintenance of rainwater drainage channels to ensure free flow and prevent blockages or erosion.

q) **Camera traps**
Operation and review of camera trap data to monitor wildlife presence and movement in and around

the project area.

13. Legal & Permit Compliance Register

The HPP maintains a Legal & Permit Compliance Register to identify and track all applicable environmental, social, H&S, and governance legal requirements and permits conditions relevant to Lakhami HPP activities. The register includes:

a) Applicable Georgian laws and regulations.
b) Environmental permits, licenses, and approvals.
c) Conditions attached to permits and approvals.
d) Monitoring, reporting, and renewal requirements.
e) Responsible persons for compliance and follow-up.

Compliance status is reviewed regularly, and any gaps or deviations are recorded and addressed through corrective actions within the ESMS.

The Legal & Permit Compliance Register supports systematic compliance management and provides evidence of regulatory compliance during inspections, audits, and investors reviews.

14. Incident and Accident Management

The Lakhami HPP establishes a process for the prompt reporting, investigation, and management of environmental, social, H&S, and security-related incidents and accidents.

This process includes:

a) Immediate reporting of all Major H&S, social and environment incidents to HPP Management and CCEH key point person.
b) Monthly reporting of all near misses and minor incidents to HPP Management and CCEH key point person.
c) Classification based on severity and potential impact.
d) Investigation to identify root causes and contributing factors.
e) Definition and implementation of corrective and preventive actions.
f) Communication to management and, where required, to authorities and investors.

All incidents and accidents are recorded in an incident log and tracked until closure. Lessons learned are integrated into ESMS procedures, training, and operational controls to prevent recurrence.

Definitions:

1. **Incident** - Incident is any unplanned event or situation arising from HPP activities that has caused, or has the potential to cause, injury, illness, environmental harm, social impact, security risk, property damage, or operational disruption. Incidents include near misses, minor incidents, major incidents, social incidents, and environmental incidents.
2. **Accident** - Accident is an incident that results in actual injury or ill health to a person, damage to property or equipment, environmental harm, or adverse social impact. Accidents are therefore a subset of incidents where harm or loss has materialised.
3. **Near Miss** -Near miss is an event or situation that could have resulted in injury, damage or loss but did not do so, due to chance, corrective action and/or timely intervention.
4. **Minor Incident** - Minor Incident is an accident or near-miss that has acceptable consequences, which may cause minor interruption but has limited consequences.
5. **Major Incident** - Major Incident is an event or situation, with a range of serious consequences, which requires special arrangements to be implemented by site H&S Manger, one or more emergency responder agencies, emergency services. Major incident may include serious injury of workers, damage of project equipment or significant damage of third-party health and/or property.
6. **Social Incident** - Social Incident is an event or situation arising from HPP activities that results in,

or has the potential to result in, adverse impacts on workers, local communities, or other stakeholders. This may include labour disputes, community grievances, protests, security-related incidents, or any action that disrupts social relations or project operations.

7. **Environmental Incident** - Environmental Incident is an event or situation resulting from HPP activities that causes, or has the potential to cause, adverse impacts on the environment. This may include pollution, spills, uncontrolled discharges, damage to habitats, non-compliance with environmental permits, or any other incident affecting air, water, soil, biodiversity, or natural resources.

15. Management of Non-conformance

The Lakhami HPP establishes and maintains a process for identifying, recording, and managing non-conformances related to environmental, social, H&S, and governance requirements.

Non-conformances may arise from:

a) Internal inspections, monitoring, or audits.
b) External audits, investors reviews, or regulatory inspections.
c) Incidents, accidents, or near misses.
d) Contractor and sub-contractor non-compliance.
e) Stakeholder complaints or grievances.

All identified non-conformances are documented and assessed to determine root causes and potential risks. Appropriate corrective and preventive actions are defined, assigned to responsible persons, and implemented within agreed timeframes.

The effectiveness of corrective actions is monitored and verified, and non-conformances are formally closed once satisfactory resolution is confirmed.

This process ensures timely issue resolution, reduces the risk of recurrence, and supports continuous improvement of ESMS performance.

16. Contractor and Subcontractor Management

The Lakhami HPP establishes and implements a contractor and subcontractor management process to ensure that contractors and subcontractors comply with applicable environmental, social, H&S, and governance requirements.

This process includes:

a) Clear ESG and H&S requirements incorporated into contracts.
b) Pre-qualification and selection of contractors based on ESG and H&S performance, where applicable.
c) Site induction and training for contractors prior to commencement of works.
d) Ongoing supervision, monitoring, and performance review.
e) Corrective actions in case of non-compliance.

Contractor performance is monitored throughout the contract period to ensure alignment with ESMS requirements and legal obligations.

17. Training and Competency

The Lakhami HPP ensures that employees, contractors and subcontractors have the necessary competence to perform their roles in accordance with ESMS requirements.

Training and competency management includes:

a) Identification of training needs related to ESG, H&S, and job-specific risks.
b) Induction training for new employees, contractors and subcontractors.
c) Periodic refresher training and toolbox talks.

d) Role-specific training for personnel with ESMS responsibilities.
e) Maintenance of training records and attendance logs.

This process supports safe operations, regulatory compliance, and effective ESMS implementation.

18. Data Management and Reporting

The Lakhami HPP establishes procedures for the collection, storage, management, and reporting of ESMS-related data.

This includes:

a) Systematic collection of monitoring and performance data.
b) Maintenance of accurate and up-to-date logs and registers.
c) Internal reporting to management on ESG and H&S performance.
d) External reporting to regulators, investors, and other stakeholders, as required.
e) Data quality checks to ensure accuracy, completeness, and reliability.

Effective data management and reporting support informed decision-making, transparency, and continuous improvement of ESMS performance.

19. Audit and Assurance

The Lakhami HPP conducts periodic audits and reviews to assess the effectiveness of the ESMS and verify compliance with legal, permit, and applicable investors requirements.

Audits and assurance activities may include:

a) Internal ESMS reviews conducted by HPP management or designated personnel.
b) External audits or assessments carried out by independent experts, investors, or regulators.
c) Reviews following significant incidents, accidents, or non-conformances.

Audit findings are documented and communicated to management. Identified gaps, non-conformances, or improvement actions are recorded and addressed through corrective and preventive actions within defined timeframes.

Audit and assurance activities support transparency, accountability, and continuous improvement of ESG performance.

20. Continuous Improvement & ESMS Review

The Lakhami HPP is committed to the continuous improvement of its ESMS to ensure ongoing effectiveness and relevance.

The ESMS is reviewed periodically and updated as necessary to reflect:

a) Changes in HPP activities, scope, or operational conditions.
b) Changes occurred as a result of MoC process.
c) Updates to legal, permit, or investors requirements.
d) Findings from audits, inspections, and monitoring.
e) Lessons learned from incidents, near misses, and grievances.
f) Feedback from employees, contractors, sub-contractors and stakeholders.

Management reviews ESMS performance using monitoring results, reports, MoC lessons learned, audit outcomes, and ensures that necessary improvements are implemented.

This process ensures that the ESMS remains proportionate to the HPP's risk profile and supports responsible, compliant, and sustainable operation over time.

21. List of Acronyms

CAPA	Corrective and Preventive Action
CCEH	Caucasus Clean Energy Holding
E&S	Environmental and Social
EIB	European Investment Bank
ESG	Environmental, Social, and Governance
ESMS	Environmental and Social Management System
FMO	Dutch Development Bank
GWh	Gigawatt-hour
H&S	Health and Safety
HPP	Hydropower Plant
IFC	International Finance Corporation
m^3/s	Cubic meters per second
MW	Megawatt
MoC	Management of Change
NCR	Non-Conformance Report
OeEB	Austrian Development Bank
OHS	Occupational Health and Safety
OHTL	Over Head Transmission Line
SEP	Stakeholder Engagement Plan

22. Annexes

Annex # 1 | Organizational Structure