



Al Samtah Solar Project

Non-Technical Summary

PREPARED FOR
EDF Power Solutions and Saudi
Electricity Company

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ACRONYMS AND ABBREVIATIONS

Acronym	Description
AC	alternating current
CCRA	Climate Change Risk Assessment
CLO	Community Liaison Officers
DC	direct current
ECRA	Electricity and Cogeneration Regulatory Authority
EDF	EDF Power Solutions
EHS	Environmental, Health, and Safety
EPFI	Equator Principles Financial Institutions
EP	Equator Principles
ERM	Environmental Resources Management Limited
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
GCD	Global Climate Database
GM	Grievance Mechanisms
HCIS	High Commission for Industrial Security
HRRA	Human Rights Risk Assessment
IP	Indigenous Peoples

Acronym	Description
IREA	International Renewable Energy Agency
KBA	Key Biodiversity Areas
KPI	Key Performance Indicators
KSA	Kingdom of Saudi Arabia
LRP	Livelihood Restoration Plan
LTIFR	Lost Time Injury Frequency Rate
MEWA	Ministry of Environment, Water and Agriculture
MHRSD	Ministry of Human Resources and Social Development
MW	megawatts
NAAQ	National Ambient Air Quality
NCEC	National Center for Environmental Compliance
NREP	National Renewable Energy Program
NTP	Notice to Proceed
OHS	Occupational Health and Safety
OHSMP	Occupational Health and Safety Management Plan
PV	photovoltaic
SCADA	Supervisory Control and Data Acquisition
SCTA	Saudi Commission for Tourism and Antiquities
SEC	Saudi Electricity Company
SEP	Stakeholder Engagement Plan
SLIP	Supplementary Lenders Information Pack
SPPC	Saudi Power Procurement Company
TCFD	Task Force on Climate-related Financial Disclosures
WBG	World Bank Group

1. PROJECT OVERVIEW

The Al Samtah Solar Power Project (the Project) is a utility-scale photovoltaic (PV) power plant with an installed capacity 719.8 megawatts (MW) located in the Samtah Governorate of Jazan Province in the southwestern Kingdom of Saudi Arabia (KSA). The Project is part of KSA's National Renewable Energy Program (NREP), which is a key pillar of the country's Vision 2030 agenda to diversify the energy mix and reduce dependence on fossil fuels for domestic electricity generation.

Over its estimated 25-year operational lifetime, the Project is expected to produce approximately 1,616,153 MWh of electricity per year, avoiding an estimated net 22,513,875 tonnes of CO₂ emissions when compared to equivalent fossil fuel-based generation a figure verified through both manual and PVSyst software methods using an emission factor of 0.592 tCO₂ /MWh sourced from the International Renewable Energy Agency (IRENA).

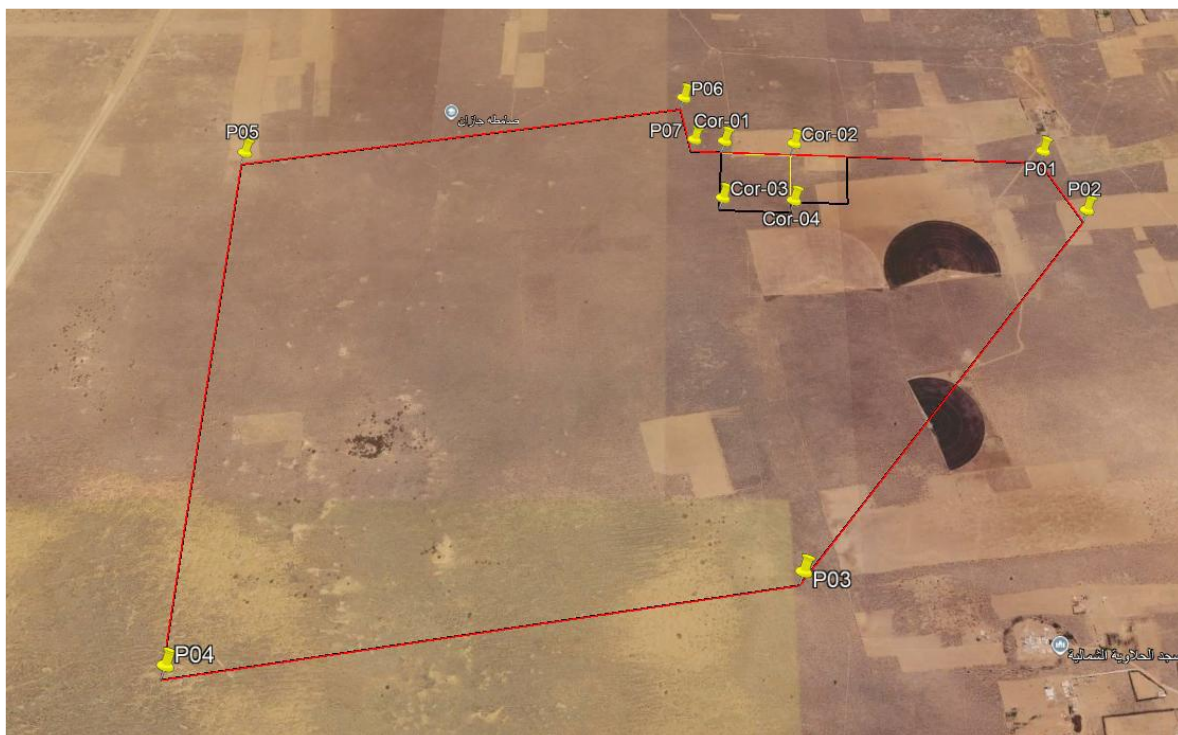
TABLE 1-1 PROJECT LOCATION

Project Name	Al Samtah Solar Power Project
Location	Samtah area, Jazan Province, southwestern Saudi Arabia
Site Area	Approximately 11.478 km ²
Distance from Jazan City	Approximately 33 km southeast
Proximity to Yemen Border	Project is located in Jazan Province which borders Yemen to the south
Land Characteristics	Predominantly flat sandy plain with minimal elevation change (25–32 m ASL), suitable for solar PV development



Source: Environmental and Social Impact Assessment dated in 31 October 2025

FIGURE 1-1 LOCATION OF THE PROJECT IN JAZAN PROVINCE



Source: Environmental and Social Impact Assessment dated in 31 October 2025

FIGURE 1-2 BOUNDARIES OF THE PROJECT

1.1 PURPOSE OF NON-TECHNICAL SUMMARY

This Non-Technical Summary (NTS) has been prepared by Environmental Resources Management (ERM) on behalf of EDF Power Solutions and Saudi Electricity Company (SEC) to support their financing approach for the Al Samtah Solar Power Project. The NTS is intended to provide lenders and financial institutions with an accessible summary of the Project's environmental and social (E&S) profile, consistent with the disclosure requirements of international lender standards, including the Equator Principles (EP4) and IFC Performance Standards (PS).

It should be noted that this NTS has been commissioned specifically to meet international financing disclosure requirements and does not constitute a regulatory submission under the Kingdom of Saudi Arabia's national environmental permitting framework.

The NTS draws upon and summarises E&S assessment work undertaken by Applus Arabia on behalf of the Saudi Power Procurement Company (SPPC), which led the Environmental Impact Assessment (EIA) process and associated permitting with the National Centre for Environmental Compliance (NCEC) prior to EDF and SEC's involvement in the Project. EDF and SEC subsequently engaged ERM to review this existing documentation and prepare this NTS to support their financing obligations.

1.2 KEY PROJECT COMPONENTS

The Project will comprise ground-mounted solar photovoltaic (PV) panels installed on single-axis tracking systems that automatically follow the sun's movement throughout the day, maximising electricity generation. The key infrastructure components are summarised below.

- Solar panels and tracking systems: Bifacial PV modules mounted on rotating frames that tilt to optimise sunlight capture from morning to evening.
- Electrical infrastructure: An on-site substation and a dedicated overhead transmission line of approximately 6 km to connect the Project to the national electricity grid.
- Site facilities: An administration building, maintenance workshops, prayer facilities, and a temporary accommodation camp for construction workers.
- Site access and security: Internal and external access roads, perimeter fencing, CCTV, and controlled access gates.
- Waste management: Designated storage areas for general, recyclable, and hazardous waste, managed in accordance with applicable Saudi regulations.
- Panel cleaning: Robotic dry-cleaning systems to maintain panel efficiency without the use of water.

1.3 PROJECT TIMELINE AND WORKFORCE

The Project lifecycle comprises four phases: Planning (led by SPPC prior to EDF/SEC selection), Construction, Operation and Maintenance, and Decommissioning. At the time this Non-Technical Summary was prepared, the Project was at the conclusion of the Planning Phase, with EDF/SEC having been selected as the preferred developer by the Saudi Power Procurement Company (SPPC) but not yet having taken contractual or operational control of the site.

TABLE 1-2 PROJECT TIMELINE

Milestone	Timeline
Construction Duration	Construction is expected to take approximately 21 months from Notice to Proceed (NTP) to Commercial Operations Date (COD), with full plant commissioning anticipated within 16 months.
Operational Lifetime	25 years (design lifetime of PV modules)
Decommissioning	Approximately 30 months; workforce of 1,000–1,500 workers required; activities to be defined prior to end of operational life

2. PROJECT PROPONENT AND KEY STAKEHOLDERS

The Project involves a range of organisations with distinct roles and responsibilities across its development lifecycle. The table below sets out the principal parties

TABLE 2-1 PROJECT PROPONENT

Project Proponent	
Saudi Power Procurement Company (SPPC)	Project developer; drove the EIA process and NCEC permitting
Project Developers	EDF Power Solutions (EDF) and Saudi Electricity Company (SEC)
Government Procurer	SPPC responsible for the competitive tender process, local ESIA, land acquisition, and site clearance prior to handover to the Project Developers
Local ESIA Consultant	Applus Arabia for Geotechnical and Environmental Works prepared the local ESIA and supporting technical studies (ecology, soil, hydrology, carbon, water) dated 31 October 2024
EPC Contractor	To be appointed; responsible for construction and operationalisation of on-site ESMP, OHS Plan, Labour Management Plan, and Worker GM during the construction phase
National Regulator (Environmental)	National Center for Environmental Compliance (NCEC) / Ministry of Environment, Water and Agriculture (MEWA) responsible for environmental permitting and compliance monitoring under the Environmental Law (Royal Decree No. M/165, 2020)
National Regulator (Social/Land)	SPPC, acting under Ministry of Energy and other relevant government bodies responsible for land acquisition, community displacement, and stakeholder engagement activities during Stage 1
National Energy Sector Regulator	Electricity and Cogeneration Regulatory Authority (ECRA) licensing for electricity generation and grid interconnection

3. REGULATORY AND LENDER FRAMEWORK

3.1 NATIONAL REGULATORY REQUIREMENTS

The Project is regulated under the Kingdom of Saudi Arabia's environmental and social legal framework, which assigns primary responsibility for environmental permitting to the NCEC under MEWA, and for social matters (including land acquisition and community engagement) to SPPC as the lead government entity. Key national instruments applicable to the Project include:

- Environmental Law (Royal Decree No. M/165, 2020) and its Executive Regulations requires an Environmental and Social Impact Assessment (ESIA) for all Category 2 and 3 activities; the Project has been classified as Category 2 (moderate environmental impacts) by NCEC. An Environmental Permit was issued for the Project based on the local ESIA dated October 2024.
- National Ambient Air Quality (NAAQ) Standards and the Executive Regulations for Air Quality set permissible limits for key pollutants including PM10, PM2.5, NO2, SO2, O3, and CO.
- NCEC Noise Standards limit noise to 70 dBA during daytime and 65 dBA during nighttime at sensitive receptors.
- MEWA Standards for Soil Protection set permissible limits for heavy metals and chemical parameters in soil; all baseline soil samples at the site complied with these limits.
- Law of Antiquities, Museums and Urban Heritage (Royal Decree M/3, 1436 AH) requires SCTA approval for any activities within or adjacent to archaeological or heritage sites; SCTA coordination is required during construction if any chance finds occur.
- Saudi Arabia's Personal Data Protection Law (PDPL, March 2023) governs collection, processing, storage, and transfer of personal data, relevant to CCTV and worker data management.
- Labour Law and relevant decrees administered by MHRSD govern employment conditions, migrant worker protections, and Saudisation (workforce localisation) requirements.
- High Commission for Industrial Security (HCIS) standards applicable to security management arrangements at the Project site.

In order to comply with NCEC permitting requirements under the Environmental Law (Royal Decree No. M/165, 2020), a local ESIA was prepared for the Project by Applus. The local ESIA, dated 31 October 2024, was submitted to NCEC on behalf of SPPC as the lead government entity. Following review of the local ESIA, NCEC issued an Environmental Permit for the Project, confirming that the Project meets the applicable national environmental regulatory requirements.

It is noted that this NTS has been prepared by ERM separately from, and subsequent to, the local ESIA process. It draws upon the findings of the local ESIA and supplementary assessments to support the international financing disclosure obligations of EDF Power Solutions and SEC, and does not constitute a regulatory submission under the KSA national permitting framework.

3.2 INTERNATIONAL LENDER STANDARDS

To demonstrate bankability and meet the requirements of international lenders, the Project has been assessed against the following internationally recognised environmental and social standards:

- IFC PS on Environmental and Social Sustainability (PS1–PS8, 2012) and associated Guidance Notes the primary benchmark for private sector environmental and social management, applicable to projects seeking financing from Equator Principles Financial Institutions (EPFIs).
- Equator Principles Version 4 (EP4, 2020) a risk management framework adopted by financial institutions for determining, assessing, and managing E&S risks in project finance. The Project has been classified as Category B, meaning its potential adverse impacts are limited in number, generally site-specific, largely reversible, and readily addressed through mitigation.
- World Bank Group (WBG) Environmental, Health, and Safety (EHS) Guidelines including the General EHS Guidelines and sector-specific guidelines for Electric Power Transmission and Distribution; provide technical benchmarks for pollution prevention, occupational health and safety, noise, and emissions.
- UN Guiding Principles on Business and Human Rights (UNGPs, 2011) inform the Human Rights Risk Assessment (HRRRA) approach and the Project's due diligence obligations regarding its workforce and supply chain.
- IFC Good Practice Handbooks including those on Stakeholder Engagement, Cumulative Impact Assessment and Management, and guidance for utility-scale solar power plants.

To support compliance with the above international lender standards, EDF Power Solutions and SEC commissioned ERM to undertake an independent review of the existing local ESIA documentation against the applicable IFC Performance Standards, EP4, and WBG EHS Guidelines. This review resulted in the preparation of an Environmental and Social Gap Assessment, formally titled 0810144_ Al Samtah Solar Project_Gap Analysis Report_Rev3, dated 10 February 2026, which identified areas where the local ESIA did not fully meet international lender requirements.

To address the gaps identified, ERM subsequently prepared a Supplementary Lenders Information Pack (SLIP), formally titled 0812772_ Al Samtah Solar Project_Updated ESIA_Rev2, dated 17 February 2026. The SLIP provides supplementary assessments, revised impact predictions, and additional mitigation and monitoring measures in respect of those topic areas where alignment with IFC PS and WBG EHS Guidelines required augmentation of the local ESIA findings. This NTS draws upon both the local ESIA and the SLIP as its primary source documents.

4. ENVIRONMENTAL BASELINE

The environmental baseline was established through a combination of desktop review of published literature, field measurements conducted by Applus Arabia on 9–10 August 2023 (air quality), 12–16 August 2024 (ecology and biodiversity surveys), and an additional site reconnaissance visit on 5–6 January 2026 by ERM. The following sections summarise the key findings across the main environmental parameters.

4.1 CLIMATE AND METEOROLOGY

The climatic and meteorological baseline presented in this section was established as part of the local ESIA process and is drawn from Section 5.3.2 of the local ESIA prepared by Applus Arabia. The Project site is located approximately 20 km from the Red Sea coast in Jazan Province, which experiences a hot desert climate (Köppen classification BWh) characterised by high temperatures, significant humidity, and very low annual rainfall. Key climate parameters are summarised below.

TABLE 4-1 CLIMATE DATA

Climate Data	
Summer Temperatures	June to September: typically above 40°C, with peak daytime temperatures occasionally reaching 45°C or higher
Winter Temperatures	December to February: daytime averages 25–30°C; night-time temperatures rarely below 20°C
Annual Temperature Range (Mean)	26°C (January) to 34°C (July); monthly mean temperatures range from 26–34°C year-round
Annual Rainfall	Approximately 70–100 mm per year; concentrated in winter months (November–February); July is wettest at 17.3 mm
Relative Humidity	Ranges from 37% (June) to 78% (January); year-round humidity influenced by proximity to Red Sea
Prevailing Wind	Mild seasonal variation; windiest period June–November with average speeds around 11.9–12.6 km/h; July is windiest month
Solar Irradiance	Daily shortwave solar energy ranges from 5.2 kWh/m ² (December, darkest month) to 6.9 kWh/m ² (April, brightest month)

The consistently high solar irradiance throughout the year makes the site highly suitable for PV energy generation. However, the extreme heat also poses occupational health risks to outdoor workers, and intense rainfall events pose a residual flooding risk to project infrastructure both of which are addressed in the Climate Change Risk Assessment (Section 8).

4.2 TOPOGRAPHY AND SOILS

The topographic and soil baseline presented in this section was established as part of the local ESIA process and is drawn from Sections 5.3.3.1 (Topography) and 5.3.4.3 (Soils) of the local ESIA prepared by Applus Arabia.

The Project site is situated on a predominantly flat sandy plain. The terrain is characterised by a maximum elevation of 32 m above sea level and a minimum of 25 m, with gentle slopes throughout, typically less than 5% gradient, making the site highly suitable for PV installation with minimal grading requirements.

Three soil samples were collected from across the site and analysed against MEWA soil quality standards. Soil testing confirmed the site is underlain by unconsolidated desert soils of a silty gravel composition. No pre-existing contamination was identified, with all parameters tested — including heavy metals, cyanide, fluoride, and sulphur — confirmed to be within applicable MEWA permissible limits. Baseline soil conditions therefore provide a clean reference point for future monitoring during and after Project operations..

4.3 HYDROLOGY AND WATER RESOURCES

The hydrological and water resources baseline presented in this section was established as part of the local ESIA process and is drawn from Section 5.3.5 of the local ESIA prepared by Applus Arabia.

The site is well-drained, with only two minor wadi (dry riverbed) streams crossing the project area. These channels direct surface runoff gently toward the main wadis outside the project boundary. The nearest major hydrological features are Wadi Al Ghusainiah (approximately 13 km from the site) and Wadi Jizan (approximately 40 km away). Given these distances, the risk of significant fluvial flooding or flow-related hydrological impacts from these features on the project site is minimal.

There are no identified groundwater resources or natural surface water bodies within the project site boundary. Water for construction activities, estimated at approximately 35 m³/day for civil works and 75 m³/day for dust suppression, no site groundwater abstraction is planned. During operations, water demand will be limited to domestic use by site personnel (approximately 140 people at 250 litres per person per day) and robotic module cleaning (approximately 10.8–13.28 m³/day), reducing demand significantly compared to traditional wet cleaning methods.

The site benefits from CCRA-informed drainage design: the EPC Contractor is contractually required to conduct a full hydrological study and design drainage and levelling works based on a 100-year return period storm event prior to construction.

4.4 AMBIENT AIR QUALITY

The ambient air quality baseline presented in this section was established as part of the local ESIA process and is drawn from Section 5.3.4 of the local ESIA prepared by Applus Arabia.

Baseline air quality monitoring was conducted at two locations within the Project site in August 2023 by Applus Arabia's accredited mobile laboratory, using NCEC-approved measurement methods. Monitoring results confirmed that ambient air quality across all measured parameters — including PM₁₀, PM_{2.5}, NO₂, SO₂, O₃, CO, and H₂S — was within applicable NCEC permissible limits prior to construction. Elevated PM₁₀ readings were recorded, consistent with the naturally dusty arid desert environment characteristic of the region. These results confirm the absence of pre-existing air quality impairment at the site and serve as the baseline against which post-construction air quality will be assessed.

4.5 AMBIENT NOISE

Baseline noise monitoring was conducted at eight points across the project site boundary following NCEC standards. Recorded noise levels during both daytime and nighttime periods fell within the NCEC permissible limits of 70 dBA during the day and 65 dBA during the night. The primary noise sources in the vicinity were found to be wind and distant vehicle movements. No significant point sources of industrial noise were identified near the site. These results establish a quiet rural baseline against which construction and operational noise will need to be managed.

4.6 ECOLOGY AND BIODIVERSITY

A comprehensive five-day terrestrial ecological survey was conducted by Applus Arabia specialists from 12–16 August 2024, covering three survey zones across the 11.478 km² site footprint. A supplementary site reconnaissance was conducted on 5–6 January by ERM, which provided additional field observations. Key findings are presented below.

4.6.1 HABITATS

The Project site is classified as Modified Habitat within the Red Sea-Arabian Desert Shrublands Ecoregion, characterised by flat, unconsolidated sandy soils with sparse vegetation. The habitat has been subject to prolonged anthropogenic modification including livestock grazing and on-site arable farming. No rivers, wetlands, formally protected areas, Key Biodiversity Areas (KBAs), or legally designated conservation zones were identified within or immediately adjacent to the site..

4.6.2 FLORA

Eleven vascular plant species were recorded across the site, all classified as Least Concern on the IUCN Red List, with no threatened, endangered, or endemic species identified. Vegetation cover was generally sparse, consistent with the modified desert habitat character of the site. All trees on site are protected under Saudi national regulations and will require permits for removal prior to construction.

4.6.3 FAUNA

Fauna surveys confirmed that the site supports a limited assemblage of species typical of modified desert habitats in the region. Key findings are summarised below.

- Reptiles: No spiny-tailed lizards were recorded during either the August 2024 Applus Arabia surveys or the January 2026 ERM reconnaissance, despite targeted searches.
- Birds: A total of approximately 13 bird species were recorded during the August 2024 Applus Arabia surveys, all classified as Least Concern on the IUCN Red List. The Steppe Eagle (Endangered) was identified as a potential seasonal visitor.
- Mammals: No mammals were directly observed.

4.6.4 CRITICAL HABITAT DETERMINATION

Critical Habitat, as defined under IFC PS6, refers to areas with high biodiversity value, including habitats that support significant concentrations of endangered or critically endangered species, areas of importance for endemic or restricted-range species, or habitats that are considered rare or rapidly declining at a global or national scale. Projects that trigger Critical Habitat criteria are subject to more stringent requirements under PS6, including the need to demonstrate no net loss of biodiversity.

Based on the combined evidence from the Applus Arabia field surveys (August 2024), the ERM site reconnaissance (January 2026), cross-referencing with IUCN Red List data, and an IBAT desktop review, it is concluded that the Project site does not trigger IFC PS6 Critical Habitat criteria. All species recorded are classified as Least Concern on the IUCN Red List, no threatened or endangered species were confirmed present, and the site is assessed as Modified Habitat with low biodiversity sensitivity.

It is acknowledged that the survey dataset is limited, particularly in the absence of spring (May–June) and winter (November–December) seasonal surveys typically required to capture reptile breeding seasons and seasonal avifauna. However, the overall low-risk biodiversity profile of the site is considered sufficient to offset the need for additional baseline surveys at this time.

5. SOCIAL BASELINE

The social baseline was compiled through a desktop review of the local ESIA, secondary published data, and the January 2026 site reconnaissance visit.

5.1 ADMINISTRATIVE CONTEXT AND POPULATION

The social baseline presented in this section was established as part of the local ESIA process and is drawn from Sections 6.1 and 6.2 of the local ESIA prepared by Applus Arabia.

The Samtah Governorate accounts for approximately 14.8% of Jizan Province's regional population. The city of Jazan, The regional capital had an estimated population of approximately 136,007 in 2010. The nearest permanent settlements to the project site are Al Halawiya (approximately 1.0 km south of the site boundary), Al Mansouria (1.5 km south), Al Maqdearah (1.6 km south), and Al Gadab (1.9 km west). No permanent residential structures were identified within the project site boundary during field observations

The Project is located within the Samtah Governorate of Jizan Province, southwestern Saudi Arabia. Jizan Province is an important administrative region divided into 16 governorates and bordered by the Red Sea to the west and Yemen to the south. According to 2017 General Authority for Statistics estimates, the total population of Jizan Province was approximately 1,560,000, representing 4.8% of KSA's national population. Of this, approximately 1,210,000 are Saudi nationals and 360,000 are non-Saudis.

5.2 LAND USE AND LIVELIHOODS

The land use and livelihoods baseline presented in this section was established as part of the local ESIA process and is drawn from Section 5.3.1 of the local ESIA prepared by Applus Arabia, supplemented by observations made during ERM's site reconnaissance in January 2026.

The project site is located in a predominantly rural, undeveloped area. Primary land use in the project area consists of traditional pastoral activities, principally camel and goat grazing by Bedouin communities and limited small-scale arable farming. Camel grazing was observed across all three survey zones during both the August 2024 ecological survey and the January 2026 site reconnaissance. Agricultural land uses were also observed in the northeast of the project area (historically under agricultural cultivation, noted as areas of the Ministry of Energy). Satellite imagery and field observations confirmed the presence of abandoned structures and a demolished property within the site boundary.

During the January 2026 reconnaissance visit, active grazing and crop farming activities were confirmed to be ongoing in parts of the site at the time of the visit, despite the expectation that SPPC would deliver a site clear of all pre-existing uses prior to handover to EDF/SEC. This observation has been formally notified to SPPC by the EDF/SEC, and SPPC has acknowledged the observations. The site handover date had not been finalised at the time this report was prepared. EDF/SEC has no operational control of the site at this time.

5.3 SOCIO-ECONOMIC CONDITIONS

The socio-economic baseline presented in this section was established as part of the local ESIA process and is drawn from Section 6.3 of the local ESIA prepared by Applus Arabia.

Jizan Province's regional GDP was approximately 23.3 billion Saudi Riyals in 2012, representing approximately 0.9% of the Kingdom's total GDP. The region experienced an average annual GDP growth rate of approximately 15% between 2009 and 2012. The city of Jazan has an Overall City Prosperity Index score of 62.7%, with strong performance in environmental sustainability (86%) but room for improvement in equity, social inclusion, and quality of life indicators.

The project area is connected to the wider region via Highway 55, which serves as a transnational trade route to Yemen. Jazan hosts King Abdullah International Airport with daily flights to Riyadh and Jeddah, and a major Red Sea port that handled approximately 3.72 million tonnes of goods in 2013. These infrastructure assets facilitate access for both construction supply chains and project personnel.

5.4 VULNERABLE GROUPS

The identification of potentially vulnerable groups draws on desktop research, the findings of the local ESIA (Section 6.7), and observations made during ERM's site reconnaissance in January 2026. It is emphasised that the following represents a indicative list of social groups that may include vulnerable individuals in the Project area, based on general socio-economic characteristics of the region. This is not a definitive enumeration of vulnerable individuals confirmed to be present at or immediately adjacent to the site; further characterisation will be undertaken through ongoing stakeholder engagement as the Project progresses.

The following groups have been identified as potentially vulnerable::

- Women and female-headed households (including widows and divorcees): May have reduced access to public decision-making, financial resources, and economic opportunities arising from the Project.
- Elderly and retired individuals: Fixed incomes and reduced capacity to adapt to environmental or livelihood changes.
- Persons with disabilities: Physical mobility limitations and mental health conditions may restrict meaningful participation in engagement processes.
- Low-income households: Most dependent on pastoral and agricultural livelihoods and therefore most vulnerable to economic displacement if grazing access is permanently lost through site fencing.
- Migrant workers: Non-Saudi workers engaged in the construction workforce face elevated risks of labour exploitation, wage theft, and limited access to remedy, particularly within the KSA labour market context.

Nomadic and semi-nomadic pastoralist communities: Communities associated with the Bani Malik and Bani Attia tribes in the Samtah Governorate who use the site for seasonal camel and goat grazing. Their interests in continued rangeland access represent a key consideration under IFC PS5 (Land Acquisition and Involuntary Resettlement) and PS6 (Biodiversity Conservation and Sustainable Management of Living Natural Resources).

Specialised engagement provisions to ensure the meaningful participation of these groups are set out in the Stakeholder Engagement Plan (SEP) prepared by ERM on behalf of EDF/SEC, formally titled Al Samtah Solar Project: Updated Stakeholder Engagement Plan (Attachment E, Document Reference: 0812772, Rev. 2, dated 17 February 2026), and described further in Section 10 of this NTS.

5.5 CULTURAL HERITAGE AND INDIGENOUS PEOPLES

The cultural heritage baseline presented in this section is drawn from Section 6.6 of the local ESIA prepared by Applus Arabia, and the Indigenous Peoples assessment is drawn from Section 6.7.2 of the local ESIA prepared by Applus Arabia. Both are supplemented by ERM's site reconnaissance in January 2026 and an Indigenous Peoples (IP) Screening Memo prepared by ERM in February 2026.

No archaeological monuments, sites, or structures of cultural heritage significance were identified within the project site boundary during the local ESIA site visits or the 2026 reconnaissance. The nearest UNESCO World Heritage Site in the Jazan region is the Farasan Islands Reserve, located approximately 40 km offshore. The Project site is confirmed to be far from all sites on Saudi Arabia's UNESCO World Heritage List and Tentative List.

A Chance Find Procedure has not yet been formally established for the Project but is required to be developed as part of the ESMS prior to construction commencement, to manage the risk of encountering previously unrecorded cultural heritage during ground disturbance activities.

An Indigenous Peoples (IP) Screening Memo was prepared in February 2026, based on a desktop review of available secondary sources. Key findings are: KSA does not formally recognise any groups as Indigenous Peoples under national law; however, tribal identity — particularly among Bedouin communities — is deeply embedded in Saudi culture and is associated with customary land use practices, distinct dialects (including the Mehri language in border regions), and customary legal systems) that may qualify under IFC PS7 criteria. No IP individuals or settlements were observed within the site boundary during field observations. Based on available information, IFC PS7 is not considered to be formally triggered; however, this conclusion is subject to the data limitation that no detailed primary socio-economic baseline survey has been conducted. The EDF/SEC will need to decide — in consultation with the lender group — whether additional investigation is required.

6. KEY ENVIRONMENTAL AND SOCIAL IMPACTS

The following table summarises the key environmental and social impacts identified across the Project's construction and operational phases, drawing from the local ESIA's impact assessment methodology (which evaluates impacts based on receptor sensitivity, impact magnitude, duration, extent, and reversibility). Pre-mitigation and post-mitigation significance levels are indicated.

TABLE 6-1 SUMMARY OF IMPACTS

Impact Category	Phase	Pre-Mitigation	Post-Mitigation	Key Observation	Source
Dust / Air Quality	Construction	Moderate	Minor	Earthworks, vehicle movements, and material handling will generate fugitive dust; 24-hour monitoring at two locations confirmed compliant baseline; dust suppression plan required	Local ESIA (Applus Arabia)
Exhaust Emissions	Construction	Minor	Negligible	Diesel-powered equipment and vehicles; low-sulphur diesel required; no permanent operational air emissions	Local ESIA (Applus Arabia)
Ambient Noise	Construction	Minor	Negligible	Heavy machinery, pile driving, and vehicle movements; nearest settlement 1.0 km from site; nighttime works to be restricted	Local ESIA (Applus Arabia)
Surface Water Availability	Construction	Moderate	Minor	Construction water demand (~110 m ³ /day) sourced from approved tankers; potential pressure on local water resources in a water-stressed basin	Local ESIA (Applus Arabia)
Groundwater Quality	Construction	Minor	Negligible	Spills and leaks of fuel, lubricants, and chemicals; managed through secondary containment, spill kits, and contractor protocols	Local ESIA (Applus Arabia)
Soil Contamination (Spills)	Construction & Operation	Minor	Negligible	Chemical spills from equipment maintenance; managed through impervious storage, bunding, and emergency procedures	Local ESIA (Applus Arabia)
Soil Erosion & Compaction	Construction	Minor	Negligible	Earthworks and vehicle traffic; managed through designated roads, topsoil conservation, and revegetation	Local ESIA (Applus Arabia)
Ecology / Biodiversity	Construction	Minor	Negligible	Site has low biodiversity sensitivity (Modified Habitat); confirmed absence of Uromastix; tree removal requires permits; fencing design should allow small fauna movement	Local ESIA (Applus Arabia); supplemented by ERM SLIP and January 2026 reconnaissance
Landscape / Visual Impact	Operation	Minor	Negligible	Large-scale PV array on flat terrain; low-reflectivity anti-reflective coating on panels; Glint & Glare assessment confirms no aviation conflicts	Local ESIA (Applus Arabia)

Impact Category	Phase	Pre-Mitigation	Post-Mitigation	Key Observation	Source
Traffic & Transport	Construction	Moderate	Minor	Up to 1,350 workers during construction; heavy vehicle movements on regional roads; traffic management plan required	Local ESIA (Applus Arabia)
Land Acquisition & Economic Displacement	Pre-construction	Minor	Negligible	Agricultural lands and grazing areas to be fenced; ongoing grazing observed as at Jan 2026; SPPC responsible for clearance; PS5 gap remains pending lender review	Local ESIA (Applus Arabia); supplemented by ERM SLIP and January 2026 reconnaissance
Community Health & Safety	Construction	Minor	Negligible	Dust, traffic, infectious disease risk from migrant workforce influx; community health assessment by EPC required	Local ESIA (Applus Arabia)
Occupational Health & Safety	Construction & Operation	Moderate	Minor	High heat stress risk (>286 days/year with apparent temp >35°C); electrical hazards during operation; working at height; rigorous OHS plan required	Local ESIA (Applus Arabia); supplemented by ERM SLIP
Migrant Worker Welfare	Construction	Minor	Under development	Up to 1,350 predominantly non-local workers in temporary camp; forced labour, wage theft, and freedom of association risks in KSA context; Worker Protection Plan required from EPC	ERM SLIP
Employment (Positive)	Construction & Operation	Positive	Positive	Creation of ~1,350 temporary construction jobs and ~39–150 permanent operational positions; preference for local labour required	Local ESIA (Applus Arabia)
Climate Change – Flooding	Operation	Likely Material	Unlikely Material	1-in-500-year pluvial flood depths of up to 2.28 m in PV area; EPC hydrological study and drainage design required; financial quantification recommended	ERM SLIP (CCRA)
Climate Change – Heat	Construction & Operation	Likely Material	Unlikely Material	353 days/year projected to exceed 35°C apparent temperature by 2050; heat stress protocols and administrative controls effectively mitigate risk	ERM SLIP (CCRA)
GHG Emissions (Positive)	Operation	Positive	Positive	Net avoided emissions of ~22,513,875 tCO ₂ over 25-year operational lifetime; LONGi HI-MO 5 panels have carbon footprint of 405 kg CO ₂ /kWp, certified under ISO 14067	Local ESIA (Applus Arabia); verified by ERM

Note: The local ESIA's significance classifications use a four-level scale: Negligible, Minor, and Moderate, Major. The table reflects the local ESIA's findings and supplemented observations.

7. MITIGATION MEASURES AND ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

Mitigation measures for the Project have been developed across three distinct workstreams. First, a number of mitigation measures have been incorporated directly into the Project design, including the selection of a site classified as Modified Habitat with low biodiversity sensitivity, the adoption of robotic dry-cleaning systems to minimise water consumption, and the use of anti-reflective low-reflectivity panel coatings to reduce glint and glare impacts. Second, the local ESIA prepared by Applus Arabia identified a series of mitigation measures to address impacts identified through the national EIA process. Third, EDF/SEC, as the Project developer, has committed to implementing a further set of mitigation measures and management plans to ensure compliance with IFC Performance Standards, EP4, and WBG EHS Guidelines, as identified through ERM's gap assessment and SLIP. The mitigation measures described in this section reflect all three workstreams and are structured by environmental and social theme.

7.1 ESMP STRUCTURE AND GOVERNANCE

The ESMP is structured around the following organisational hierarchy. The Project Director holds ultimate accountability for E&S performance and reports to EDF/SEC's senior management and to lenders. The EPC Director is responsible for day-to-day implementation of all mitigation measures during construction. An on-site HSE Manager will conduct daily site inspections, deliver toolbox talks, manage incident reporting, and prepare monthly ESMP compliance reports. The Stakeholder Manager leads community and worker engagement and manages grievance mechanisms. An NCEC Supervisor provides periodic regulatory oversight. All employees, including subcontractor personnel are required to comply with ESMP procedures and promptly report any incidents.

7.2 KEY MITIGATION MEASURES BY THEME

7.2.1 AIR QUALITY AND DUST

- Daily dust suppression through water spraying of active construction areas, unpaved roads, and stockpiles; records to be maintained.
- All material transport trucks to be covered with impervious sheeting; zero dust-related complaints from communities as a KPI.
- Speed limits of 15–20 km/h within the site and 30 km/h on gravel roads; no unauthorised burning of materials.
- Low-sulphur diesel (<0.5% S) required for all diesel-powered equipment; vehicles emitting visible black smoke to be removed from service.

7.2.2 WATER RESOURCES

- All water to be sourced from approved tanker suppliers; 100% of water sourced from valid certified sources as KPI.
- Fuel and chemical storage areas to be bunded to 110% capacity; zero untreated wastewater discharged to open land.
- Septic tanks and soak pits for all sanitary waste; zero groundwater contamination incidents as KPI.

- Monthly tracking of water consumption; target 5% year-on-year reduction in non-domestic water use during operations.

7.2.3 SOIL AND WASTE MANAGEMENT

- 100% of hazardous waste segregated and stored in clearly labelled, impervious, contained areas; disposal through vendors approved by the relevant authority; auditable manifests for all hazardous waste consignments.
- Zero instances of unauthorised dumping or improper disposal.
- Broken or damaged PV panels to be moved to designated scrap yard within 24 hours of identification; end-of-life panels returned to manufacturer for recycling under take-back agreement.

7.2.4 ECOLOGY AND BIODIVERSITY

- Fencing design to allow free movement of small fauna species (minimum 30 cm gap between ground and first rail).
- Minimum number of trees to be removed; removed trees to be replaced by plantings in the vicinity; all tree removals require permit from competent authority.
- No hunting, trapping, or wildlife harassment by workers zero instances as KPI; biodiversity awareness training for all site personnel annually.
- Operations restricted to designated roads; no off-roading by workers or vehicles.

7.2.5 OCCUPATIONAL HEALTH AND SAFETY (OHS)

- Lost Time Injury Frequency Rate (LTIFR) below industry average for similar projects; zero lost time injuries as target for decommissioning.
- 100% of workers to complete mandatory H&S induction training before starting work; 100% use of task-appropriate PPE.
- Mandatory heat stress protocols: job rotation, shaded rest areas, hydration stations, and shift management to limit peak-heat exposure.
- A formal Occupational Health and Safety Management Plan (OHSMP) to be prepared by the EPC Contractor, covering routine activities and unplanned events separately; medical facilities and emergency response procedures to be in place prior to construction.

7.2.6 LABOUR AND WORKERS

- Comprehensive HR Policies and Procedures covering recruitment, terms of employment, wages, working hours, disciplinary procedures, freedom of association provisions, non-discrimination, and retrenchment.
- Worker committees or equivalent alternative mechanisms to be established; anonymous feedback channels (hotline, suggestion boxes) to supplement formal GM.
- Monthly EPC contractor compliance reports to EDF/SEC covering grievances received, actions taken, committee meetings held, and training delivered.
- Child labour and forced labour risk assessment for the direct workforce and primary supply chain; Supply Chain Management Plan to be developed.

7.2.7 COMMUNITY HEALTH AND SAFETY

- Traffic escorts for heavy equipment movements near settlements; movement of project vehicles restricted to designated routes and daytime hours.
- Fencing and warning signage at all active excavation sites; zero traffic accidents involving project vehicles as KPI.
- Community Health and Safety Risk Assessment to be conducted by the EPC Contractor, covering infectious disease risks, GBVH risks, access to health facilities, and unplanned events.

7.2.8 LAND ACQUISITION AND RESETTLEMENT

- EDF/SEC to continue engagement with SPPC regarding compensation plans for current land users (including illegal occupants), documentation of resettlement activities, and timeline for full site clearance.
- EDF/SEC will not commence construction in areas where active site use remains until SPPC has resolved outstanding resettlement matters.
- Livelihood Restoration Plan (LRP) elements to be incorporated into future stakeholder engagement once lender requirements are confirmed.

7.2.9 CULTURAL HERITAGE

- A Chance Find Procedure must be established before construction commences, defining protocols for immediate work stoppage, notification of SCTA and relevant authorities, documentation of finds, and assessment by cultural heritage experts.

8. CLIMATE CHANGE RISK ASSESSMENT SUMMARY

Physical Climate Change Risk Assessment (CCRA) for the Project (Draft 02, 16th of April 2026) in alignment with EP4 requirements for higher-risk Category B projects has been conducted. The assessment followed a six-step methodology aligned with the Task Force on Climate-related Financial Disclosures (TCFD), evaluating the Project's exposure to eleven physical climate hazards under baseline conditions and two future IPCC Shared Socioeconomic Pathways (SSP1-2.6 low emissions and SSP5-8.5 high emissions) across three time horizons (Baseline, 2030, and 2050).

Climate data was extracted from Global Climate Database (GCD) using ISIMIP3b downscaled CMIP6 models at five representative locations across the site. Project-specific hazard thresholds were set based on EPC design specifications, for example, PV module operational range of -30°C to 60°C and sector best practice.

8.1 KEY HAZARD FINDINGS

Of eleven hazards screened, three were assessed as 'Likely Material' at the inherent (unmitigated) level: extreme heat (heatwaves), rainfall flooding, and water stress and drought. The remaining hazards including cold events, wildfire, extreme wind, and landslides were assessed as 'Unlikely Material' throughout all scenarios and time horizons. A summary of inherent and residual risk ratings is provided below.

TABLE 8-1 KEY HAZARD FINDINGS

Hazard / Risk	Key Receptor(s)	Inherent Risk	Residual Risk	Change by 2050	Key Mitigation
Heatwaves – health & safety	Site personnel	Likely Material	Unlikely Material	~353 days >35°C apparent temp by 2050 (SSP5-8.5)	Heat stress protocols, job rotation, hydration, PPE; workforce reduces to ~39 in ops phase
Rainfall flooding – PV modules & electrical assets	PV modules, inverters, cabling	Likely Material	Unlikely Material	Max 1-in-500yr depth: 2.26 m (baseline) → 2.28 m (2050 SSP5-8.5)	EPC hydrological study required; panels elevated 1.5–4.1 m; financial quantification recommended
Rainfall flooding – substation	Project substation	Likely Material	Unlikely Material (conditional)	0.73 m at substation (baseline), slight increase by 2050	EPC drainage design to 100-yr return period; levelling works to address residual depth
Rainfall flooding – access routes	Site access roads	Likely Material	Unlikely Material	0.68–0.70 m at access point (baseline → 2050)	Water-insensitive road materials; box culverts and bridges; drainage design
Rainfall flooding – admin buildings	Administrative buildings	Likely Material	Unlikely Material	Site-wide drainage and stormwater measures	Site-wide drainage; stormwater management plan

Hazard / Risk	Key Receptor(s)	Inherent Risk	Residual Risk	Change by 2050	Key Mitigation
Water stress & drought	Admin facilities, water supply	Likely Material	Unlikely Material	Water stress index: 3.88 baseline → up to 4.10 by 2050	Robotic (dry) panel cleaning; water sourced from approved tankers; no groundwater abstraction
Wildfire	Multiple receptors	Unlikely Material	N/A – no further action	FFDI increases to 123 days by 2050 (SSP5-8.5)	Sparse vegetation limits ignition risk; standard fire safety measures apply
Cold events	Electrical equipment, water pipes	Unlikely Material	N/A – no further action	Min temp rises from 14.1°C to 15.7°C by 2050	No ice days projected under any scenario; site naturally protected
Extreme wind	PV modules, transmission	Unlikely Material	N/A – no further action	Mean daily wind speed remains low (~2.5 m/s); no tropical cyclone basin	Standard structural design sufficient
Landslides	PV modules, access routes	Unlikely Material	N/A – no further action	Zero days with landslide-permitting conditions	Flat terrain; not applicable

8.2 RECOMMENDED NEXT STEPS

- Conduct a financial quantification assessment of the potential impact of residual rainfall flooding risk on PV infrastructure and the project substation, in accordance with EP4 CCRA requirements.
- Work with the project design team to review and update required flood mitigation measures including detailed flood mapping of the substation location and PV installation area, supplementing the modelled data in this report.
- Develop a Climate Change Risk Management Plan to ensure critical substation infrastructure is protected and PV modules are elevated above maximum projected inundation depths in all relevant site areas.
- Introduce formalised temperature-based work triggers, enforced work-rest ratios, and acclimatisation protocols for all outdoor workers, particularly during the first construction season.

9. HUMAN RIGHTS RISK ASSESSMENT SUMMARY

A High-Level HRRRA Report (Draft 02, 17 February 2026) has been prepared to meet the requirements of EP4 (which requires human rights due diligence as part of the E&S assessment for Category B projects) and IFC PS2. The HRRRA follows the methodology of the EP4 Guidance Note on Human Rights Assessments (2020) and the UN Guiding Principles on Business and Human Rights (UNGPs, 2011). It assesses potential human rights risks by severity (scale, scope, and irremediability) and likelihood, identifies affected stakeholders, determines the Company's connection to each risk (Cause, Contribute, or Directly Linked), and provides recommendations.

The assessment was based on desktop review of project documentation (local ESIA, SLIP documents), publicly available secondary sources (Human Rights Watch reports, ILO data, UN documents), and country-level risk data. Primary data collection was not possible at this stage. A full Human Rights Risk Assessment is recommended when EDF/SEC has full operational and contractual control of the site.

9.1 KEY FINDINGS

Human Rights Risk	Affected Stakeholder	Severity	Likelihood	Connection	Priority Recommendations
Child Labour / Right to Education	Children	HIGH	Low	Directly Linked	Robust age-verification by contractors; child labour monitoring in all labour assessments; accessible GM for reporting
Collective Bargaining & Freedom of Association	Project & contracted workers	Medium	HIGH	Directly Linked	Employee committees where permitted; internal processes for safe raising of workplace concerns; non-retaliation protections
Modern Slavery (incl. Uyghur supply chain risk)	Indirect & supply chain workers	Medium	Medium	Directly Linked	Modern Slavery Policy clause in all EPC contracts; prohibition of recruitment fees; supply chain questionnaire for PV panel sourcing; HRRRA of supply chain
Grievance Mechanism / Right to Remedy	N/A (positive commitment)	N/A	N/A	N/A	Separate worker and community GMs; multilingual access; alignment with UNGP 31 effectiveness criteria
Non-Discrimination & Harassment	Project & contracted workers	Medium	Medium	Contribute / Directly Linked	Project-wide Non-Discrimination and Anti-Harassment Policy; confidential GM; regular training for supervisors
Occupational Health and Safety	Project & contracted workers	Medium	HIGH	Cause (ops) / Contribute (construction)	Robust OHS oversight throughout project

Human Rights Risk	Affected Stakeholder	Severity	Likelihood	Connection	Priority Recommendations
					lifecycle; periodic effectiveness evaluation
Working Hours & Wages	Project & contracted workers	Low	Low	Contribute	Payroll and working-hour records subject to EDF/SEC periodic review; accessible GM for wage concerns
Civil & Political Rights (Freedom of Expression)	Workers, community, media, HR defenders	Medium	Low	Directly Linked	Monitor GM for rights violations; swift investigation of alleged violations; report to authorities if life at risk
Civil & Political Rights (Privacy)	Workers	Medium	Low	Directly Linked	Project-specific Data Protection Policy aligned with Saudi Arabia's PDPL (2023)
Right to Health (Environmental Factors)	Workers, community members	Medium	HIGH	Cause	Community Health and Environmental Management Plan integrating air quality, water, traffic, waste, and noise
Right to Health (Social Factors)	Community members	Medium	HIGH	Contribute	Worker Accommodation Management Plan (WAMP) from EPC; monitoring of GM for accommodation-related grievances
Right to Water	Communities	Low	Medium	Cause	Robust contractor compliance system for water use; monitor GM for health harms linked to water sources
Vulnerable People – Migrant Workers	Migrant workers	HIGH	Medium	Directly Linked	Worker Protection Plan from EPC committing to ILO Fundamental Principles on Rights at Work
Vulnerable People – Disabled Workers	Disabled workers	Medium	Medium	Directly Linked	Functional Needs Assessment for all workers with disabilities; workplace accessibility; EPC reporting on accommodations
Land Acquisition & Resettlement	Landowners, farmers, pastoralists	Medium	HIGH	Contribute	Stakeholder Engagement and Communication Plan; engage economically displaced farmers and pastoralists; coordinate with SPPC

9.2 OVERALL RECOMMENDATION

Based on the combination of (a) designated High human rights risks affecting migrant workers and children, and (b) significant data gaps regarding management controls at the project, EPC contractor, and supply chain levels, it is recommended that a full Human Rights Risk Assessment be commissioned when EDF/SEC has full operational and contractual control of the site. This will allow access to all relevant management policies, procedures, and processes at the project, EPC, and supply chain levels, enabling a comprehensive and verifiable assessment of actual risk exposure.

10. STAKEHOLDER ENGAGEMENT SUMMARY

10.1 UPDATED STAKEHOLDER ENGAGEMENT PLAN

Stakeholder engagement for the Project has been undertaken in two sequential phases. An SEP was initially prepared by Applus Arabia as part of the local ESIA (Section 9) process to support NCEC permitting requirements. Subsequently, ERM prepared an Updated SEP on behalf of EDF/SEC to augment the original document and ensure alignment with international lender standards, specifically IFC PS1 and EP4 Principle 5. The Updated SEP, formally titled Al Samtah Solar Project: Updated Stakeholder Engagement Plan (Attachment E, Document Reference: 0812772, Rev. 2, dated 17 February 2026), was prepared alongside a Community Grievance Mechanism (Draft 02, 17 February 2026) and provides EDF/SEC with a robust framework for stakeholder engagement once they assume operational ownership of the site. The Updated SEP covers the pre-construction, construction, and operational phases of the Project.

The key stakeholders identified in the Updated SEP are as follows:

- National Government authorities: MEWA, NCEC, REPDO (Renewable Energy Project Development Office), ECRA, SCTA, MHRSD, Saudi Water Authority, Ministry of Transport and Logistics Services.
- Provincial and Local Government: Jizan Provincial Administration and Samtah Municipal Administration.
- Religious and Community Leaders: to be identified in coordination with SPPC.
- Directly Impacted Communities: residents of Al Halawiya, Al Mansouria, Al Maqdearah, and Al Gadab villages; economically displaced farmers and pastoralists (seasonal land users).
- Vulnerable Groups: women, elderly, persons with disabilities, low-income households, migrant workers, Bedouin.
- Civil Society: Community-based organisations, NGOs (none specifically identified yet in the project AoI).
- Security services: local security forces, Border Guards.

10.2 ENGAGEMENT PRINCIPLES AND METHODS

The SEP is structured around the IFC Good Practice Handbook principles of transparency, accountability, trust, mutual respect, collaboration, responsiveness, proactiveness, fairness, accessibility, and inclusivity. Planned engagement activities across project phases include:

- Pre-Construction: Quarterly or six-monthly project updates via newspaper articles, notice boards, town halls, social media, and a project website; targeted engagement with affected land users on livelihood restoration; disclosure of the GM prior to and throughout the pre-construction phase.
- Construction: Bi-monthly community meetings via Community Liaison Officers (CLOs); monitoring of subcontractor social performance; continued livelihood restoration engagement with displaced farmers and pastoralists.
- Operation: Transition to operations briefings; periodic updates on project activities and service interruptions; ongoing GM management; livelihood restoration monitoring.

Special measures for vulnerable groups include:

- linguistically inclusive materials in local dialects;
- in-community meeting locations; separate group discussions for women and minority groups;
- flexible timing to accommodate domestic responsibilities;
- mobile outreach and audio-visual materials for low-literacy groups; and
- home visits where mobility is limited.

All engagement activities will be coordinated with SPPC to ensure alignment with KSA regulatory requirements and to avoid conflicts with prior SPPC activities.

11. GRIEVANCE MECHANISM

Two distinct Grievance Mechanisms (GMs) will be established for the Project: one for external community stakeholders and one for workers (including contractor and subcontractor employees). This separation is required under IFC PS1 and PS2, and addresses a specific gap identified in the local ESIA, which described a combined community and worker GM inconsistent with lender standards.

11.1 COMMUNITY GRIEVANCE MECHANISM

The Community GM is designed for members of affected communities, local residents, and external stakeholders to raise concerns about the Project's environmental and social performance. Key design features include:

- Free of charge and accessible at all times during all project phases.
- Complainants may remain anonymous if they choose.
- Multiple submission channels: email, hotline, letter, grievance boxes at strategic locations, online form on the project website, walk-in verbal reporting, and through a third party or intermediary (e.g., community leader).
- Grievance forms available in Arabic and other languages spoken by workers, with visual guidance for low-literacy audiences.
- Screened and categorised within 24 hours of receipt as Minor, Moderate, or Major, based on the significance criteria defined in the SEP.
- Response timeframes: Minor grievances acknowledged within 7 days, investigation begun within 10 days; Moderate acknowledged within 4 days, investigation within 5 days; Major acknowledged within 1 day, investigation within 2 days.
- Grievances involving human rights violations, sexual harassment, or GBV are automatically classified as Major and escalated to EDF/SEC Ethics and Compliance.
- Remediation options: rehabilitation, restoration, satisfaction (including public apology), and compensation (fair and proportional; never as substitute for potential criminal liability).
- If complainants are unsatisfied with the outcome, a formal appeal process is available, escalating to senior EDF/SEC management, neutral third-party mediation, and ultimately legal recourse.
- Separate provisions for vulnerable groups, including the right to speak with a representative of preferred gender in a private setting, accelerated processing, and assistance throughout the process.

The Community GM does not replace complainants' rights to seek judicial or administrative remedies. This right will be clearly communicated to all stakeholders.

11.2 WORKER GRIEVANCE MECHANISM

The Worker GM enables project workers (including all contractor and subcontractor employees) to raise workplace concerns relating to working conditions, health and safety, employment terms, discrimination, or harassment. Key features include:

- Accessible, confidential, and anti-retaliation protections in place.
- Multiple reporting channels: workers' representatives, HR personnel, direct supervisors, anonymous hotline, and suggestion boxes.

- Clear escalation procedures if concerns remain unresolved at operational level.
- Compliant with Saudi Labour Law and IFC PS2 requirements.
- Regular monitoring with KPIs reported monthly to the EDF/SEC, including: number of grievances received, response times, resolution rates, and worker satisfaction levels.

11.3 MONITORING AND REPORTING

A centralised electronic Grievance Register will be maintained, with each grievance assigned a case number and all communications securely stored. A quarterly report will review the performance of both the SEP and the GM processes, identify patterns and recurring issues, and recommend corrective actions. These reports will be shared with Project management and relevant department heads, and made available for external review upon request by lenders.

Key Performance Indicators for the grievance management system include: percentage of grievances resolved within 2, 10, and 30 working days; percentage reduction in recurring complaints; and percentage of complainants satisfied with the resolution outcome.

12. OVERALL CONCLUSION

The Al Samtah Solar Power Project is a nationally significant renewable energy infrastructure project that will make a material contribution to KSA's Vision 2030 renewable energy targets and will deliver substantial climate benefits over its operational lifetime — avoiding an estimated 22.5 million tonnes of CO₂ emissions. The Project has been developed to meet local KSA regulatory requirements and received its Environmental Permit from NCEC based on the local ESIA dated October 2024.

It has been noted that the adverse environmental and social impacts are consistent with a Category B classification: they are site-specific, largely reversible during construction, and substantially manageable through the implementation of appropriate mitigation measures. It is considered that the Project to be on a trajectory toward full alignment with IFC PS1–8 and EP4 requirements, recognising that the Project's involvement in the project only commenced at later stage and that several remaining actions are time-bound to specific project milestones.

The assessment has been conducted in a pragmatic, materiality-focused manner consistent with established approaches for lender-financed projects in the KSA context. The conclusions and recommendations in this Non-Technical Summary and the supporting documents are provided to assist lenders in conducting their own Environmental and Social Due Diligence, and to support the EDF/SEC in demonstrating responsible development in line with international best practice.