



**Egyptian National Authority for
Tunnels (NAT)**

Human Rights Impact Assessment – Summary for Public Disclosure

High Speed Rail-Green Line-Egypt

21 December 2022

Project No.: 0626724

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Human Rights Impact Assessment – Summary for Public Disclosure

High Speed Rail-Green Line-Egypt

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Acronyms and Abbreviations

Name	Description
Aol	Area of Influence
CHSMP	Community Health, Safety and Security Management Plan
CoC	Code of Conduct
ECS	EcoConServ
EBRD	European Bank for Reconstruction and Development
EP	Equator Principles
EPC	Engineering, Procurement and Construction
EPRP	Emergency Preparedness and Response Plan
E&S	Environmental and Social
ESDD	Environmental and Social Due Diligence
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
HRIA	Human Rights Impact Assessment
HSE	Health, Safety and Environment
HSR	High-Speed Rail
IFC	International Finance Corporation
ILO	International Labour Organisation
NAT	National Authority for Tunnels
NGO	Non-Governmental Organisation
OHSP	Occupational Health and Safety Plan
PS	Performance Standards
PPE	Personal Protective Equipment
RAP	Resettlement Action Plan
RoW	Right of Way
SEP	Stakeholder Engagement Plan
STD	Sexually Transmitted Diseases
TAMP	Traffic and Access Management Plan
UN	United Nations
WP	Work Package

1. INTRODUCTION

1.1 Project Overview

The Egypt High Speed Rail Project (HSR) consists in the design, construction, commissioning and operation of the country’s first high-speed train system. The network of three lines (referred to as the Green, Blue and Red Lines) will extend some 2,000 km, connecting Cairo, Upper Egypt, the Red Sea and the Mediterranean:

- Green Line: Marsa Matruh to Ain El Soukhna; 660¹ km length
- Blue Line: Fayoum/ Beni Suef Station to Abu Simbel; 1,060 km length, + 86 km Al Fayoum² section.
- Red Line: Safaga to Qena; 336 km length.

Figure 1-1 presents a map of the three (03) lines and the stations.



Source: SYSTRA

Figure 1-1 The Three (03) High Speed Rail Routes

¹ The km length of the Green Line (and the other Lines) is based on current information, and may vary slightly depending on the source, as the alignment details and total length are still subject to confirmation in the final Project design. Such small deviations in the km length are not considered as relevant for the purpose of the ESIA and this Scoping Report.

² Note that the Al Fayoum section has already been subject to an Environmental and Social Impact Assessment (ESIA) procedure along with the Green Line although, but for technical reasons, the detailed project and related construction will take place within the Blue Line.

This Human Rights Impact Assessment (HRIA) is focused solely on the development of the Green Line, and references to the “Project” in this document are related only to the Green Line.

The HSR Green Line Project comprises of the design, construction, commissioning, and operation of new electrified high-speed lines, forming an approximate 600 km network, running from Marsa Matrouh to Ain El Sokhna (see Section 3.1).

The Project is owned by the Ministry of Transport (MoT) through the National Authority of Tunnels (NAT). NAT is committed to undertake this Project in conformance with Egyptian laws and regulations and with the applicable International Environment and Social (E&S) Standards. The Project design is being considered, as far as possible, to avoid/minimize/mitigate E&S impacts, including and, in particular, the evaluation of alternatives in the route selection. NAT is supported in this Project by the international transport consultant SYSTRA.

The Construction Phase of the Project is divided into two Work Packages, which are coordinated by NAT/SYSTRA:

- Work Package 1 (WP1): the bulk of the civil-construction works, to be executed by Egyptian contractors, in progress;
- Work Package 2 (WP2): the rails, electrification and controls, plus provision of the rolling stock, to be executed by Siemens and its Consortium Partners (Siemens/CJV-Consortium³).

Deutsche Bahn in Joint Venture with Elswedey Electric will be operators of the line following its commissioning. Ultimate responsibility of operations will still remain with NAT.

Funding for WP1 works will be from the Egyptian Government, while funding⁴ for WP2 works is foreseen to come mainly from international commercial banks (assumed to be signatories of the Equator Principles), supported by Export Credit Agencies (ECAs) such as the German Euler Hermes and the Italian SACE.

The Siemens/CJV-Consortium, on behalf of NAT, has engaged ERM GmbH (ERM), with EcoConServ Environmental Solutions (ECS) as subcontractor, to conduct an Environmental and Social Impact Assessment (ESIA), for the construction, commissioning and operation of the Green Line as well as a Human Rights Impact Assessment (HRIA) in conformance with the international standards (e.g. Equator Principles – 4).

The current “Human Rights Impact Assessment – Summary for Public Disclosure” reports the findings from the HRIA in summary form within the publicly disclosed Project documentation, in compliance with Equator Principle IV (EP4) requirements. The full HRIA is not intended for public disclosure, and it is solely confidential.

1.2 Aims and Objectives

This in hand “Human Rights Impact Assessment – Summary for Public Disclosure” presents a summary/overview of the potential Project-related risks and proposed mitigation measures that have been identified in the full HRIA.

³ The term “Siemens/CJV-Consortium” refers to one or more open consortium/consortia established by and amongst Siemens Mobility Egypt LLC, Siemens Mobility GmbH and the Construction Joint Venture, which consists of Orascom Construction S.A.E. and The Arab Contractors (Osman Ahmed Osman & Co)

⁴ The here-referenced project funding applies only to certain portions of the Project (namely those aspects involving the Siemens/CJV-Consortium). Nevertheless, the other aspects of the Project (mainly related to WP1 construction) can be considered as associated activities/facilities and are therefore also considered in this report.

The full HRIA provides an understanding of the Project's salient human rights issues⁵ *related to the overall Project under both WP 1 and WP 2*. This information will help in understanding what additional management measures or safeguards are required to mitigate potential human rights risks associated with the Project by the respective responsible parties in order to meet the requirements of EP4 and address the gaps identified.

In assessing the Project's salient human rights issues, the HRIA focuses on the rights set out in and protected by the International Bill of Rights and the International Labour Organisations (ILO) fundamental conventions and the specific rights of vulnerable people and populations, women, children, migrant workers and persons with disabilities.

1.3 Limitations

The HRIA document has been prepared based on publicly available data, secondary data and information gathered during the social fieldwork conducted in 2022 as part of ERM/ECS's Environmental and Social Impact Assessment (ESIA) for the Green Line.

ERM relies on information obtained from engagement with NAT and Siemens with regard to existing policies and procedures, based on the knowledge acquired by ERM and ECS during the HSR Project Green Line ESIA. With respect to relationships with external communities, ERM did not have access to other documents regarding potential engagements between the WP1 contractors, Siemens/CJV-Consortium, NAT and surrounding community representatives.

ERM's findings are accurate and complete only to the extent that information provided to ERM is accurate and complete.

2. SUMMARY OF SALIENT HUMAN RIGHTS ISSUES AND RECOMMENDED MITIGATION MEASURES

To minimise the potential for a human rights risks or impacts to occur, management measures should be established. Table 6-1 identifies recommended management measures for mitigating potential risks and impacts that have been identified in the screening process. Human rights risks, impacts and management measures should be monitored over time to ensure they appropriately mitigate the potential impacts and risks.

A key aspect of managing the potential risks and impacts identified through a HRIA will be monitoring, evaluation and reporting.

2.1 Monitoring and Evaluation

Once adverse human rights impacts have been identified and mitigation measures have been determined, it is essential to follow up on whether the mitigation measures are implemented and if they have effectively addressed the impacts. Risk is often created by forces external to the business cycle. As circumstances evolve, the key assumptions that underpinned the initial assessment of human rights impacts of a project/ supplier/ contractor/ partners may no longer hold true. In such circumstances, existing mitigation measures may no longer be adequate. Ongoing monitoring will allow NAT to ensure the working conditions of WP1 and WP2 contractors have not changed.

The human rights impacts, and the corresponding management measures should be monitored and evaluated by NAT is its role of Projects Owner throughout the life of the Project. The objectives of monitoring are to:

- Verify the predicted risks and issues;

⁵ Salient human rights issues are those that have the potential to result in the most severe negative impacts.

- Verify that the management measures are being implemented as planned;
- Assess the effectiveness of the management measures; and
- Provide data for any necessary internal reporting.

Monitoring should be a continuous process of data collection and review. The review of information collected should be used by NAT to help identify issues of concern early and inform opportunities for improvement.

Monitoring data will need to be collected regularly and should be used to evaluate the effectiveness of mitigation and management measures. Appropriate timeframes for evaluation will be established in the specific management plans recommended in Table 6-1, but as a general rule of thumb, evaluations should be conducted by NAT at a minimum on an annual basis and updated or revised based on the outcomes of the evaluation.

For the Construction phase, NAT will appoint the following figures with responsibilities of monitoring the Project commitments towards human rights protection:

- MoT/NAT Land Acquisition and Compensation (LAC) Manager
- MoT/ NAT Social Development Officer (SDO)
- MoT/ NAT Community Liaison Team (CLM) Manager and Officers (CLOs).

External monitoring by a neutral, third party can be used to enhance the credibility of the overall management process and may be especially useful in situations where there are severe human rights impacts, distrust is high or there is significant focus on the Project from external actors as NGOs or campaigners.

IPIECA and the Danish Institute for Human Rights⁶ give the following recommendations in order to apply a human rights lens to monitoring:

- Involve affected communities and individuals, duty bearers and other stakeholders in the monitoring of impact management measures;
- Facilitate meaningful engagement by capacity building of affected communities and individuals;
- Focus on accessibility and acceptability of impact mitigation and management to affected communities and individuals;
- Take into account gender, vulnerable groups, physical accessibility of the information and technology or language and literacy barriers;
- Arrange for effective provisions for the immediate escalation of information on significant potential impacts to appropriate project management levels.
- Focus on transparency and communication, in order to ensure there is no spread of misinformation. Communication should be ensured with directly affected stakeholders (i.e. workers, management, etc.) as well as policy level stakeholders, as they may become constructive counterparts in collaborations to address key risks and impacts.

2.2 Reporting

Reporting consists in documenting and communicating the impact assessment, mitigation and management activities, and outcomes to relevant internal and external stakeholders, with a special focus on affected communities and individuals. Involving rights-holders, duty-bearers and other relevant parties in impact monitoring, as appropriate in the given context, can provide valuable

⁶ IPIECA, Danish Institute for Human Rights (2013) Integrating human rights into environmental, social and health impact assessments. Retrieved from: https://www.ipieca.org/media/1571/integrating_hr_into_environmental_social_and_his.pdf

opportunities for strengthening accountability and building trust between different parties. Participatory monitoring may gain the affected communities' trust and confidence in NAT.

As part of the Project's internal reporting systems, any human rights related incidents and issues should be reported. Reporting should record details of the incident or issue, a description of the noncompliance, engagement activities, any corrective actions taken, and the outcomes for the rightsholder/s.

As organizations face increasing pressure to manage their potential human rights impacts, it is possible that external parties such as government agencies and lenders may require additional reporting.

NAT will be required to report on any HR issues as part of their routine reporting on environment and social topics to the lenders, which is typically done on a quarterly basis. In addition, NAT should report any incidents on an ad hoc basis, with shared responsibilities among the figures presented in Section 2.1 above.

2.3 Human Rights Tabular Assessment

The following Table presents a summary of the most salient human rights issues and Project risks, taking into account the nature and context of the Project. Salient human rights issues are those issues considered to be at risk of resulting in severe negative impacts, either directly, due to a company's activities, or indirectly through association, due to its business relationships.

The risk assessment is therefore presented in a way that identifies the most salient human rights issues related to the overall Project under both WP 1 and WP 2 and which require particular attention and management by the Project as a whole.

The Table also includes a summary of the existing known management measures by NAT and Siemens/CJV-Consortium (i.e. management system and policies, presented in the column "Existing Management Measures") as well as recommended management measures as appropriate (presented in column "Additional Recommended Management Measures"). Additional NAT or other EPC contractors' management measures might be in place but not made available to ERM and thus are not mentioned in the "Existing management Measure" column. A footnote is included for all measures which are already recommended as part of the ESIA Environmental and Social Management Plan (ESMP) that NAT is committed developing for the Project.

The potential risks have been classified as *Low*, *Medium* or *High* taking into account the human rights context in Egypt and existing NAT's and Siemens/CJV-Consortium's policies (the latter applicable only to WP2) compared to international standards on human rights. Specifically, the General Impact Rank presented in the table below is evaluated prior to the implementation of the recommended management measures and based on the methodology presented in the *EP4 IV Guidance Note on Implementation of Human Rights Assessments*. According to this methodology, the impact rank is determined by assessing the likelihood of the impact against the severity of the affected rightsholders⁷.

The Residual Impact Rank after implementation of the proposed mitigation measures is lower in all the cases. From the 17 impacts identified for this HRIA, the residual impact of 16 of them results in 'Low' residual impact rank, and only one (01), results in a 'Medium' residual impact rank.

⁷ According to the EP4 IV Guidance Note on Implementation of Human Rights Assessments:

- *Severity* is determined by understanding the 'size' or degree of change caused by the impact. It is a function of one or more characteristics including the scale (how serious are the impacts for the victim?), scope (how many people could be affected by the harm?) and remediability (will a remedy restore the victim to the same or equivalent position before the harm; how easy or difficult would it be for the victim to get a remedy?) of the impact. Consideration of severity should also factor in the vulnerability of rightsholders, including their ability to cope or adapt to a change.
- *Likelihood* is a reflection of the probability of a human rights impact occurring. This takes into consideration factors such as the local operating context, extent to which human rights are protected, past human rights issues violations, and existing management measures.

The HRIA identifies the potential human rights risks that could be associated with the Project development based on the features of the local context and precedence at country level.⁸ This document is not intended to report any actual misconduct.

⁸ The existence of a precedence at country or sector level increases the likelihood of the issue to occur again.

Table 2-1 Project Human Rights Risks and Impacts and Management

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
1. Transparency, Corruption and Legal Capacity								
1.1	Risk of association and perceived complicity with government entities	<ul style="list-style-type: none"> Project workforce Contractors, subcontractors and suppliers Surrounding communities 	<ul style="list-style-type: none"> Right to adequate standard of living Right to health Right to life Right to clean environment Right to food Right to housing Right to freedom of assembly and expression Right to liberty and security Right of minorities 	Through the direct involvement of the Egyptian public sector (through NAT), the Project is directly exposed to potential abuse of public office for private gain, and to potential human rights violations which are increased when public officials potentially engage in corrupt practices with impunity. Issues of transparency in government spending and lack of enforcement of criminal penalties for corruption were identified as part of this human rights impact assessment. In addition, there is a risk of complicity of NAT, WP1 and WP2 Contractors to be implicated in a human rights violation that another company or the entity, involved in the Project can cause, if corruption is found during delivery of the Project. The construction phase of the Green Line Project increases this exposure as construction is recognized as a high-risk sector for corruption.	<ul style="list-style-type: none"> Siemens Group Code of Conduct for Suppliers and Third-Party Intermediaries (CoC) - applicable to WP2. It establishes Siemens/CJV-Consortium and their subcontractors, obligation to “not engage directly or indirectly in any form of corruption or bribery and do not grant, offer or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage. This includes to renounce from giving or accepting improper facilitation payments”. Siemens has an anti-corruption policy and compliance system to prevent, detect, and respond to cases of misconduct including bribery and corruption - applicable to WP2. Orascom Code of Business Principles, Code of Ethics and Orascom Whistle-blower Policy set obligations related to ethical and responsible business practices. 	Medium	<ul style="list-style-type: none"> Include anti-bribery and anti-corruption rules for all personnel involved in the Project (under WP1 and 2) in the Workforce Code of Conduct to be developed⁹. Include in the Recruitment and Employment Plan to be developed by NAT¹⁰ a training program which directly addresses the ways in which bribery and corruption could potentially materialize in connection to the Project. The training should be mandatory for anyone who could be in a position of engaging in any form of corruption. 	Low
2. Labour Rights								
2.1	Labour and working conditions of employees,	<ul style="list-style-type: none"> Project workforce 	<ul style="list-style-type: none"> Right to favourable working conditions 	There is a risk of association with contractors or third parties not adhering to relevant laws and	<ul style="list-style-type: none"> Siemens CoC establishes obligation for the consortium partners and subcontractors to comply with 	High	<ul style="list-style-type: none"> NAT to Develop and Implement a Human Rights Policy for the HSR Green Line Project defining NAT 	Low

⁹ ESIA ESMP commitment
¹⁰ ESIA ESMP commitment

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
	contractor and subcontractor workforce, including worker accommodation	<ul style="list-style-type: none"> ■ Contractors, subcontractors and suppliers ■ Community members looking for job opportunities ■ Vulnerable groups, such as children 	<ul style="list-style-type: none"> ■ Right to freedom from child labour ■ Right of minorities and vulnerable groups ■ Right of minorities and vulnerable groups. ■ Right to equal pay for equal work. 	<p>international standards and guidance. Risk likelihood will depend on the performance of selected local contractors and third parties with respect to international standards.</p> <p>The construction phase of the Green Line, in particular, poses a higher risk for migrant workers who are more likely to be engaged in the construction supply chain. The tight fixed deadlines and heavy reliance on multiple-layered sub-contracting make construction a high-risk sector as it increases the risk of excessive working time and reduces visibility on worker management practices.</p> <p>Management measures are in place for WP2 to reduce the likelihood and severity of a violation of labour and working conditions rights occurring. These management measures include appropriate contractual arrangements with workers, and implementation of human resource policies that largely align with relevant international standards, and mitigation and management measures to ensure that the working conditions and worker accommodation meets the international standards, reducing the impacts on the right to favourable working conditions within others. No information is available with regard to WP1 where the amount of contractors involved in the construction phase is higher. Furthermore the construction sector in Egypt is generally associated to a poor labour conditions. The impact rank is thus high.</p>	<p>international labour standards including ILO's Declaration on Fundamental Principles and Rights at Work - applicable to WP2.</p> <ul style="list-style-type: none"> ■ The majority of construction workers will be sourced from localities surrounding the Project area to minimize the need for any accommodation camps onsite. Some stations include staff accommodation camps depending on how isolated they are from the nearby city. Informal temporary accommodation camps have been installed by subcontractors. ■ Orascom Code of Business Principles and Orascom Code of Ethics cover stipulations related to labour and working conditions and the obligation to comply with the labour law - applicable to WP2. 		<p>and WP1 and 2 contractors' commitment to respecting human rights. In compliance with UN Guiding Principles (UNGP) (par. 15 and 16) the policy has to be approved by the most senior level and be made available through NAT website.</p> <ul style="list-style-type: none"> ■ Develop and implement a Workers Management Plan (WMP)¹¹ aligning with the IFC PS2. This should cover (i) the provision of clear and understandable information regarding contractual conditions; (ii) reasonable working conditions and terms of employment; (iii) provision of introductory and refresher worker training on applicable policies and legislation protecting their labour rights and establishing their obligations towards co-workers and communities; (iv) implementation of a workers grievance mechanism aligned to the UNGP principles for effective grievance mechanisms; (v) definition of key performance indicators to monitor WMP performance. ■ Include in the WMP to be developed the provision for regular third-party monitoring and auditing of labour and working conditions (as a minimum every 6 months) for both WP1 and WP2 contractors. This would enhance internal monitoring and would help further safeguard labour rights. ■ Ensure procurement processes include due diligence to screen third parties to verify that they are 	

¹¹ ESIA ESMP commitment

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
							<p>reputable and legitimate enterprises and have an appropriate ESMS that will allow them to operate in a manner consistent with the Project's requirements and EP4.</p> <ul style="list-style-type: none"> ■ Ensure similar due diligence processes are put in place by contractors and suppliers to screen and monitor recruitment and labour management practices implemented by their suppliers and subcontractors (in particular under WP1), including recruitment agencies. ■ Compliance NAT WMP and with Siemens CoC (for Consortium Partners) shall be confirmed through an auditing program¹² that should include corrective action plans in the event of non-compliance and supported by specific training focused on labour management, health and safety Project requirements. ■ Include in the Accommodation Management Plan to be developed¹³, a specific accommodation auditing programme. Including a checklist in line with ILO R115 Workers' Housing Recommendation, and IFC/EBRD Workers' Accommodation Guidance Note. ■ Incorporate in the EPC contracts for WP 1, as feasible, the obligation to comply with international labour standards including ILO's 	

¹² ESIA ESMP commitment

¹³ ESIA ESMP commitment

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
							<p>Declaration on Fundamental Principles and Rights at Work into NAT's labour, health, safety policies for suppliers and contractors. Additionally, include the expectation to implement the same obligations for contractors and in the supply chains.</p> <ul style="list-style-type: none"> ■ Add a contractual clause to NAT's agreements with suppliers, contractors and labour providers whereby they acknowledge that they might be subject to labour audits at any point during the contractual relationship to check on the fulfilment of their responsibility to uphold, specifying the expectations and potential consequences should non-compliances be identified. 	
2.2	<ul style="list-style-type: none"> ■ Health and safety risks on construction site and on the Project 	<ul style="list-style-type: none"> ■ Project workforce ■ Contractors, subcontractors and suppliers ■ Surrounding communities 	<ul style="list-style-type: none"> ■ Right to life ■ Right to health ■ Right to favourable working conditions 	<p>A health and safety incident could have serious and potentially irreparable consequences, such as injury or fatality. In order to take a proactive approach, it is important to consider the potential scale and scope of the impact, which may be high due to the large number of workers involved. The larger the workforce, the greater the potential risk. Health and safety incidents in the construction sector are quite common in Egypt and the ESIA work revealed that contractors involved in WP1 have very different health and safety standards. Furthermore, limited overview or coordination by NAT on health and safety is acknowledged, with each contractor being</p>	<ul style="list-style-type: none"> ■ Siemens CoC establishes the obligation to comply with international labour standards including ILO's Declaration on Fundamental Principles and Rights at Work - applicable to WP2. ■ Occupational Safety and Health will become part of ILOs Fundamental Principles and Conventions from December 2024. Therefore, compliance with the Occupational Safety and Health Convention, 1981 (No.155), and the Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187), will be expected from Consortium Partners. 	High	<ul style="list-style-type: none"> ■ NAT to implement an effective Environmental and Social Management System (ESMS) Management System throughout the project cycle¹⁴. This should cover¹⁵: (i) a requirement for contractors to submit an Occupational Health and Safety Plan (OHSP) ; (ii) provision of HSE induction and training to site workers, to include relevant policies, hygiene measures as well as guidance and tools to perform a Job Hazard Analysis prior to undertaking work; (iii) a schedule and process for equipment maintenance; (iv) a schedule for site inspections/ supervision and controls to verify HSE practices in 	Low

¹⁴ ESIA ESMP commitment

¹⁵ ESIA ESMP commitment

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
				responsible for its own H&S performance. Siemens and the Consortium have existing management measures that will reduce the likelihood of an injury or fatality during WP2 works, but they have no leverage on WP1. Therefore, the likelihood of H&S incidents for the Project is Very Likely and consequently the potential for a worker's right to life and/ or health to be violated.	<ul style="list-style-type: none"> Orascom Corporate Health, Safety, and Environment (HSE) Policy is based on several principles, including the identification and management of HSE hazards and risks, compliance with relevant legislation, prevention of accidents and pollution, intolerance of behaviours that contribute to accidents, reduction of waste and conservation of resources, tracking and communication of HSE performance, and ongoing improvement of HSE performance. - applicable to WP2. 		<p>the field; (v) implement first aid arrangements in all worksites; (vi) investigation of accidents and near misses and noise and dust exposure monitoring; (viii) Monitor contractors' implementation of Emergency Preparedness and Response Plans (EPRP).</p> <ul style="list-style-type: none"> NAT to ensure that workforce, including contractors and subcontractors, will be provided with health awareness training, including hazardous works, a significant briefing of hygiene practices (such as hand washing), implementation of educational outreach to increase awareness of major communicable disease and how to protect against infection and about transmission routes and the symptoms of the communicable diseases of concerns (including STDs and COVID-19)¹⁶. NAT should ensure that the Project's Community Health, Safety and Security Management Plan (CHSMP), Emergency Preparedness and Response Plan (EPRP) and OHSP¹⁷ include among others: <ul style="list-style-type: none"> a requirement for contractors to follow its requirements. the health facility assessment of medical infrastructure is conducted to determine whether sufficient resources and equipment is in place to deal with potential emergencies. 	

¹⁶ ESIA ESMP commitment

¹⁷ ESIA ESMP commitment

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
							<ul style="list-style-type: none"> • emergency scenarios involving vehicles and pedestrians (for the EPRP) • Contractors to develop and implement their own EPRP in compliance with NAT's own EPRP. • Provision of adequate Personal Protective Equipment (PPE) for workers to all concerned workers during to minimize the health impacts of working and environmental conditions (e.g. dust masks, protective gear for handling waste materials, etc); • construction sites in sections of the RoW close to inhabited areas are fenced, with pedestrian and vehicle signaling in place. • the surrounding communities are informed about the health and safety risks associated with Project construction, with trespassing the fenced areas and with playing near equipment; communities should also be informed about the meaning of signs. • That a warning stating that recruitment at the construction sites is not permitted is included in safety signage. <p>■ NAT should ensure that the Project's Traffic and Access Management Plan (TAMP)¹⁸ include the following measures:</p> <ul style="list-style-type: none"> • mapping of alternative routes, truck movements, transport of workers, and short-term closure of roads. • Communication of road diversion/closure, and 	

¹⁸ ESIA ESMP commitment

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
							<ul style="list-style-type: none"> transportation of heavy equipment for the benefit of local authorities and surrounding communities. • Training of workers driving Project vehicles on safe and responsible driving, and specific hazards associated with pedestrians and livestock. 	
2.3	<ul style="list-style-type: none"> ■ Approach to recruitment, promotion, and government treatment of vulnerable groups with respect to equal opportunity 	<ul style="list-style-type: none"> ■ Workers ■ Contractors, subcontractors and suppliers ■ Vulnerable groups 	<ul style="list-style-type: none"> ■ Right to work ■ Right to non-discrimination ■ Right of minorities and vulnerable groups ■ Right to freedom of thought, conscience, and religion, 	<p>There is potential for discriminatory practices to occur in the hiring process. While the Egyptian labour law prohibits discrimination in employment based on race, sex, religion, and political affiliation, in practice, minority groups (incl. Coptic Christians, Shiite Muslims, people of colour, and LGBTQ+ individuals) face indirect forms of discrimination with respect to their right to work (ie. access to job opportunities, discrimination upon recruitment, etc.).</p> <p>There is a risk of association with workforce providers (e.g., recruitment agencies) using abusive recruitment practices (e.g. recruitment fees) which may increase the risk of bonded labour. Overall, minority groups, children, women, and migrant workers are most vulnerable and at risk with respect to employment practices.</p> <p>Clause 7 in the Consortium Agreement (or Project's Compliance Pact) makes a specific reference to equal opportunities and equal treatment in the context of WP2. Moreover, worker's grievance management is not clearly addressed under Egyptian labour laws, however</p>	<p>Siemens CoC, establishes the obligation to comply with international labour standards including non-discrimination and equal treatment irrespective of skin colour, race, nationality, ethnicity, political affiliation, social background, disabilities, gender, sexual identity and orientation, marital status, religious conviction, or age - applicable to WP2.</p> <p>Clause 7 of the Consortium Agreement includes obligation to comply with international labour standards including ILO's Declaration on Fundamental Principles and Rights at Work. The Clause makes specific reference to "equal opportunity and equal treatment" and "adherence to applicable wage legislation, payment of fair wages, and observance of "equal pay" principles - applicable to WP2.</p>	Medium	<ul style="list-style-type: none"> ■ Should workforce providers be engaged for the provision of workforce, the Recruitment and Employment Plan¹⁹ to be developed has to address the aspects and risks associated with their involvement, and workforce providers have to abide to its rules. ■ Develop and implement a Human Resources Policy²⁰ aligned with relevant international standards with respect to recruitment, promotion, and access to remedy. <p>The NAT's Recruitment and Employment Plan should define the process to be followed for the recruitment, training and development of local personnel by all contractors involved in the Project, concretely. As part of the Plan implementation, NAT should work with local authorities and employment organisations to ensure that positions are advertised in a manner that is accessible to the communities;</p> <ul style="list-style-type: none"> ■ NAT should ensure that the recruitment process is fair and transparent, public, and open to all without discrimination, paying 	Low

¹⁹ ESIA ESMP commitment

²⁰ ESIA ESMP commitment

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
				<p>NAT is committed to having a grievance mechanism in place that should allow workers to introduce any grievance they may have regarding issues with equal opportunity and discrimination in the workplace.</p> <p>It is therefore 'likely' for this impact to take place. Scale is 'high', however irremediability and scope are considered 'medium', resulting in a 'medium' severity.</p>			<p>heightened attention to ethnic minorities and vulnerable groups. This should include a gender quota to ensure women are represented in the pool of candidates or workers, the use of inclusive vocabulary in job descriptions, as well as collaboration with local unemployment agencies.</p>	
2.4	<ul style="list-style-type: none"> ■ Risk of child labour and forced labour 	<ul style="list-style-type: none"> ■ Project workforce ■ Contractors, subcontractors and suppliers ■ Children ■ Migrant Workers ■ Other vulnerable groups 	<ul style="list-style-type: none"> ■ Right to freedom from child labour ■ Right to freedom from forced labour ■ Right to favourable working conditions 	<p>Considering the baseline conditions, there is potential for the child and forced labour, especially among vulnerable groups (e.g. migrants, refugees, or very low income Egyptian families). Child labour is mostly prevalent in Egypt in the agricultural and construction sector, especially for seasonal / temporary work.</p> <p>Nevertheless, there are several efforts undertaken by the Egyptian government to combat child labour, and the Egyptian Laws prohibits to employ children under 15 years, and it is prohibited to employ them in jobs that expose them to risk, being the minimum age for hazardous work 18 years old.</p> <p>In addition, the range of management measures have been developed and include appropriate contractual arrangements with workers prohibiting any type of child or forced labour, notably included in Clause 7 of the Consortium Agreement (even though the latter applicable only to WP2), making it unlikely this may happen in the context of the Project.</p>	<ul style="list-style-type: none"> ■ Siemens CoC establishes the obligation to comply with international labour standards including prohibition of child and forced labour - applicable to WP2. ■ Orascom Code of Business Principles and Conduct and Statement on Children's Rights is committed to ethical and responsible business practices, including strict adherence to labour laws and promotion of human rights, ensuring that its employees receive appropriate training and guidance to promote the observance of human rights and to raise concerns confidentially. - applicable to WP2. ■ Orascom Code of Business Principles and Orascom Code of Ethics cover stipulations related to labour and working conditions and the obligation to comply with the labour law - applicable to WP2. 	Medium	<ul style="list-style-type: none"> ■ Develop a guidance document on human rights describing child labour, forced labour, and other forms of modern slavery, providing concrete due diligence recommendations to mitigate the risk of these violations materialising in the supply chain. ■ Ensure contractors, subcontractors and suppliers' Human Resources policies/procedures align with relevant international standards including prohibition of child and forced labour. ■ If migrant/refugee labour is used, ensure that migrant worker contractual terms are aligned with the Human Resources Policy and procedures and the same as their non-migrant worker peers, including payment methods. ■ Promote employment opportunities locally to the extent possible. ■ NAT should oversee compliance with child labour laws among contractors and subcontractors (audit program). 	Low

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
2.5	<ul style="list-style-type: none"> Management of workers grievances 	<ul style="list-style-type: none"> Project workforce Contractors, subcontractors and suppliers Surrounding Communities 	<ul style="list-style-type: none"> Right to freedom of expression Right to access remedy without fear of retaliation 	<p>A workers grievance mechanism is foreseen in the Project Stakeholder Engagement Plan (SEP) which is part of the ESIA package. According to the Environmental and Social Due Diligence (ESDD) Report issued by Ramboll in November 2022 the system is not fully implemented yet. Moreover, taking into consideration the number of contractors that will be involved in the development of the Project, the likelihood that contractors may not apply the proper procedure for the management of grievances is deemed as likely. Finally, the grievance mechanism should be fine-tuned in order to ensure it is readily accessible, efficient and aligned with effectiveness criteria.</p>	<ul style="list-style-type: none"> NAT's grievance mechanism will be made available for any internal and external stakeholders (including project workers directly employed and subcontracted) to raise project-related concerns, comments and questions, including all project phases, activities and components of the Project, and all contractors and subcontractors under NAT responsibility (both WP 1 and 2). Grievances can be raised at no cost and anonymously. In order to identify and respond to Gender-Based Violence and Harassment (GBVH) grievances, NAT has committed to follow the guidance on "Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector", in particular, its Annex 7 on GBVH grievance mechanisms and investigative procedures). Siemens Compliance System provides two channels for reporting concerns (a whistle-blower hotline and the figure of the ombudsperson). The whistle-blower hotline is available for any employees and external stakeholders (including subcontracted workers and supply chain workers) to report compliance violations, which they can do anonymously if they chose to. The hotline is available 24 hours a day, 7 days a week, in 13 languages, online or via telephone. Orascom Code of Business Principles and Conduct guides the behaviour of all directors, employees, and partners, including suppliers and subcontractors and 	Medium	<ul style="list-style-type: none"> Develop and implement a Workers Grievance Mechanism in line with relevant international standards. The mechanism should be accessible to all on site workers including contractors, and shall be effectively communicated to workers, subcontracted workers, supply chain workers, surrounding communities. Confidentiality and no retaliation for those seeking to log a grievance must be ensured. 	Low

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
					<p>ensures that its employees receive appropriate training and guidance to promote the observance of human rights and to raise concerns confidentially. - applicable to WP2.</p> <ul style="list-style-type: none"> Orascom Whistle-blower Policy assures that the workforce report any suspected criminal or unethical conduct within the Company in good faith. - applicable to WP2. 			
2.6	<ul style="list-style-type: none"> Approach to collective bargaining 	<ul style="list-style-type: none"> Project workforce Contractors, subcontractors and suppliers 	<ul style="list-style-type: none"> Right to freedom of assembly and expression Right to strike Right to freedom of association 	<p>There is a risk of discrimination against workers who join unions or other similar organizations that are not affiliated with the state-controlled Egyptian Trade Union Federation, as only these unions are recognized by the government. In practice, the right to organize peaceful strikes is not tolerated, even though it is protected by the constitution. The law on protests prohibits gatherings that disrupt labor and production, making it difficult for workers to exercise their right to strike.</p> <p>The Trade Union Organisations Act protects workers' right to form unions and allows the organisation of strikes by unions. The Act was amended in 2019, following the approval of the ILO's recommendation by the House of Representative, with regard to abolishment of penalties involving deprivation of liberty and reduction of quotas and worker numbers to establish union committee, general unions, and union federations.</p> <p>Workers wishing to establish independent trade unions still face significant challenges in practice, as these are not recognized and strikes organized by these unions are banned, further limiting the ability of</p>	<ul style="list-style-type: none"> Clause 7 of the Consortium Agreement includes Consortium Partners' obligation to comply with international labour standards including ILO's Declaration on Fundamental Principles and Rights at Work. The Clause makes specific reference to the "recognition of workers' rights to form or join trade unions and to engage in collective bargaining, without fear of discrimination" - applicable to WP2. Siemens CoC for Suppliers and Third Party Intermediaries - applicable to WP2. Orascom Code of Business Principles and Conduct guides the behaviour of all directors, employees, and partners, including suppliers and subcontractors and ensures that its employees receive appropriate training and guidance to promote the observance of human rights and to raise concerns confidentially. - applicable to WP2. Orascom Whistle-blower Policy assures that the workforce report any suspected criminal or unethical conduct within the Company in good faith. - applicable to WP2. 	High	<ul style="list-style-type: none"> NAT should ensure that Human Resources policies/procedures applicable to the Project align with relevant international standards including collective bargaining. All workers will, as part of their induction, receive training on worker rights in line with Egyptian legislation to ensure that positive benefits around understanding labour rights are enhanced; All workers (including those of contractors and subcontractors) will be able to join unions of their choice and have the right to collective bargaining; Performance will be taken with regard to health and safety, worker management and rights as outlined in Egyptian law and ILO international standards into consideration. The outcomes of community engagement, media coverage and its workforce and Community Grievance mechanism will be reviewed and monitored for additional indications of labour-related issues that may arise. 	Low

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
				<p>workers to advocate for their rights. Therefore, It is highly likely that these rights will not be respected in the context of the project.</p> <p>In addition, there is a risk of complicity of the private EPC contractors included in WP1 and WP2 activities to be implicated in a human rights violation that another company or the government, involved in the Project can cause, if the approach to collective bargaining is not managed properly. It is highly likely that a violation of this right may occur, in particular under WP1 where the number of companies is higher and specific management measures might not be in place.</p>			<ul style="list-style-type: none"> Collaborate with workers' trade union representatives. 	
3. Security								
3.1	<ul style="list-style-type: none"> Employment of Security Forces and personnel 	<ul style="list-style-type: none"> Project workforce Contractors, subcontractors and suppliers Surrounding communities 	<ul style="list-style-type: none"> Right to life Right to freedom of assembly and expression Right to liberty and security including freedom from degrading treatment and torture Freedom from arbitrary arrest Right of minorities Right to public political participation 	<p>It is assumed that NAT will involve or work with private or public security personnel to ensure protection of work sites or accommodation facilities for project staff. There is a risk for this to result in issues that may arise from the interactions between workers and communities, as well as from the inappropriate response to worker or community protests and opposition including abuse of power, and inappropriate and disproportionate or excessive use of force.</p> <p>Opposition from local communities might arise as part of land dispossession and displacement, especially in the case of forced eviction. Although there are management measures put in place (e.g. Siemens' Code of Conduct for</p>	<ul style="list-style-type: none"> NAT's grievance mechanism will be made available for any internal and external stakeholders (including project workers directly employed and subcontracted) to raise project-related concerns, comments and questions, including all project phases, activities and components of the Project, and all contractors and subcontractors under NAT responsibility (both WP 1 and 2). Grievances can be raised at no cost and anonymously. In order to identify and respond to GBVH grievances, NAT has committed to follow the guidance on "Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector". 	Medium	<ul style="list-style-type: none"> A Security Management training will be provided to security personnel. Security Arrangements will be based on the Voluntary Principles for Security and Human Rights (VPSHR) which are international best practice. Security arrangement will be made transparent to the local communities. Consultation with them about the impact of arrangements will take place regularly²². Violation of the required standards will result in corrective actions, including termination of sub-contracts with security firms. Sufficient training including clear instructions on the objectives and the permissible actions will be 	Low

²² ESIA ESMP commitment

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
				Suppliers and Third-Party Intermediaries), the possibilities of risk management by the Project in this context is limited ²¹ , making the likelihood of this impact likely.	<ul style="list-style-type: none"> Orascom Code of Business Principles and Conduct guides the behaviour of all directors, employees, and partners, including suppliers and subcontractors, and sets expectations for how Employees should conduct themselves while representing the Company - applicable to WP2. 		<p>provided to the security personnel. The instructions will be based on the relevant Egyptian law and will be communicated as terms of employment and reinforced through periodic professional training. Given regular contact with the local populations, training on the Grievance Mechanism, such as handling of community grievances will also be provided to the security staff as part of their periodic professional training²³.</p> <ul style="list-style-type: none"> Complaints by the public (or other workers) with respect to behaviour of Security Personnel can be made via the Grievance Mechanism²⁴. Include in the Human Rights Policy reference to VPSHR with regard to contracting private security personnel at work sites and worker accommodation. Policy should cover hiring, rules of conduct, training, equipping, and monitoring of such personnel. Ensuring any allegations about abusive use of force by security forces is fully investigated and addressed. 	

4. Community Grievance Management

²¹ EBRD. PR4: Community Health, Safety and Security. Available from: https://www.ebrd.com/downloads/about/sustainability/ESP_PR04_Eng.pdf

²³ ESIA ESMP commitment

²⁴ ESIA ESMP commitment

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
4.1	<ul style="list-style-type: none"> ■ Handling of community grievances and Access to Remedy 	<ul style="list-style-type: none"> ■ Surrounding Communities ■ Vulnerable Groups 	<ul style="list-style-type: none"> ■ Right to freedom of expression and opinion and access to information ■ Right to access remedy without fear of retaliation 	<p>No information is available with regard to Project stakeholder engagement activities besides the work conducted by ERM as part of the ESIA assignment. NAT does have a grievance mechanism (GM) that applies to all of its projects in Egypt and is available on their website but not a specific one for the HSR Greenline Project. In addition, vulnerable groups might also be unable or less likely to access grievance mechanisms and might not be willing to raise their concerns due to fear of repercussions. Taking into consideration the number of contractors that will be involved in the development of the Project, the likelihood that contractors may not apply the proper procedure for the management of grievances is deemed as 'likely', and the severity as 'high'.</p>	<ul style="list-style-type: none"> ■ NAT's grievance mechanism will be made available for any internal and external stakeholders (including project workers directly employed and subcontracted) to raise project-related concerns, comments and questions, including all project phases, activities and components of the Project, and all contractors and subcontractors under NAT responsibility (both WP1 and WP2). Grievances can be raised at no cost and anonymously. In order to identify and respond to GBVH grievances, NAT has committed to follow the guidance on "Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector". ■ Siemens Compliance System provides two channels for reporting concerns (a whistleblower hotline and the figure of the ombudsperson). The whistleblower hotline is available for any employees and external stakeholders (including subcontracted workers and supply chain workers) to report compliance violations, which they can do anonymously if they chose to. The hotline is available 24 hours a day, 7 days a week, in 13 languages, online or via telephone - applicable to WP2. ■ Through Orascom Code of Business Principles and Conduct, he company is committed to contributing to the economic and social development of the 	Medium	<ul style="list-style-type: none"> ■ Develop and implement a grievance mechanism in line with IFC's Good Practice Guide to addressing grievances from Project-affected communities. Timely and effective response to reported grievances should be ensured. The mechanism should be promoted among local communities and affected rightsholders²⁵. ■ Implement the Stakeholder Engagement Plan for the Project to ensure appropriate project disclosure and consultation with relevant stakeholders, including vulnerable groups. 	Low

²⁵ ESIA ESMP commitment

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
					communities in which it operates. - applicable to WP2.			
5. Community Health and Safety, Economic Well-being								
5.1	<ul style="list-style-type: none"> Construction activities that may result in community disturbance and health and safety issues (e.g. noise, dust, waste) 	<ul style="list-style-type: none"> Communities in the Aol Vulnerable groups Project Workforce Contractors, subcontractors and suppliers 	<ul style="list-style-type: none"> Right to life Right to health Right to a clean environment 	<p>It is expected there will be a modification of the environmental conditions during construction, which heightens the potential for community disturbances (human receptors). It is assumed that the major EPC subcontractors have embedded management measures to minimise this health and safety risk and the distance of many sections of the construction site from communities. The potential for an impact is likely to be higher during construction and in particular during WP1 activities, when compared to operation. For this reason, the likelihood for a violation of the right to life and right to health is considered 'high' during construction, and 'medium' during operation.</p>	<ul style="list-style-type: none"> NAT's grievance mechanism will be made available for any internal and external stakeholders to raise project-related concerns, comments and questions, including all project phases, activities and components of the Project, and all contractors and subcontractors under NAT responsibility (both WP1 and WP2). Grievances can be raised at no cost and anonymously. Orascom Corporate Health, Safety, and Environment (HSE) Policy include the principle of identification and management of HSE hazards and risks, compliance with relevant legislation, prevention of accidents and pollution, the intolerance of behaviours that contribute to accidents, reduction of waste and conservation of resources, tracking and communication of HSE performance, and ongoing improvement of HSE performance. 	High	<ul style="list-style-type: none"> NAT should ensure that the Project's Community Health, Safety and Security Management Plan (CHSSMP) and ERP²⁶ include: <ul style="list-style-type: none"> Preventive and control measures consistent with good international industry practice and relevant international guidance such as the World Bank EHS guidelines. Agreements with suitable hospitals to provide health care in emergency situations, including provision of additional equipment or training for staff if required. Project-dedicated international medical providers should complement the services of the local medical facilities that could be used by the Project and/or training of local medical personnel. Arrangements for regular equipment maintenance as per national and international requirements. Adequate management of hazardous and non-hazardous waste in line with national and 	Low

²⁶ ESIA ESMP commitment

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
							<p>international requirements, including appropriate management, storage, and transport / disposal.</p> <ul style="list-style-type: none"> ■ A Public Utilities Enhancement Plan will be developed in close coordination with local utilities companies, authorities at the regional and local level and communities to ensure the appropriateness of the relocation and improvements of the infrastructure and services affected. ■ NAT should ensure that the SEP includes: <ul style="list-style-type: none"> • awareness sessions in the local communities to explain the Project activities and risks, including for example the types of noise, dust and vibrations and emissions from Project activities (including the blasts), traffic deviations, as well as the mitigation measures implemented. • Information distribution concerning the Grievance Mechanism and a point person to contact in case of concerns or emergency etc. • For noisy and dusty construction activities close to residential and grazing areas, timely communication should be given to the owners and users of the grazing areas, residents and local governments. • Mitigation measures to manage the impacts on surface waters, noise and air quality and dust, should be implemented as committed in the ESMP. 	

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
5.2	<ul style="list-style-type: none"> Environmental degradation from the Project operation resulting in loss of access to natural resources and associated livelihoods 	<ul style="list-style-type: none"> Communities in the Project Aol Vulnerable groups 	<ul style="list-style-type: none"> Right to food Right to a clean environment 	<p>It is expected there will be a modification of the environmental conditions during the operation phase, which heightens the potential for loss of access to natural resources and related livelihoods and income. Although the Grievance Mechanism could be used to notify of any impact on the environment and therefore livelihood of the communities, the severity would be considered 'high' and the likelihood deemed as 'likely' due to the extent of the potential impact to farmers and communities and considering the baseline conditions.</p>	<ul style="list-style-type: none"> NAT's grievance mechanism will be made available for any internal and external stakeholders to raise project-related concerns, comments and questions, including all project phases, activities and components of the Project, and all contractors and subcontractors under NAT responsibility (both Work Package 1 and 2). Grievances can be raised at no cost and anonymously. 	Medium	<ul style="list-style-type: none"> Ref. to 4.1 in this table. Ensure that all environmental and biodiversity management and mitigation measures included in the Project ESMP are implemented and monitored during construction and operation. 	Low
5.3	<ul style="list-style-type: none"> Gender-based Violence and Harassment 	<ul style="list-style-type: none"> Women LGBTQ+ 	<ul style="list-style-type: none"> Right to life Right to health Rights to non-discrimination Right to work Right to adequate standard of living Right to housing 	<p>The Project is expected to generate movements of population and workers influx, which heightens the potential for GBVH. Due to the scope, scale and irremediability of the potential violation, the severity of the impact is considered to be high. The likelihood for an impact is 'highly likely' to be present during construction, given the volume of workers, and during operation, as it is a widespread issue reported by women in public transportation. For this reason, the severity for an impact to the right to life and right to health and to non-discrimination is considered 'high'.</p>	<ul style="list-style-type: none"> NAT's grievance mechanism will be made available for any internal and external stakeholders to raise project-related concerns, comments and questions, including all project phases, activities and components of the Project, and all contractors and subcontractors under NAT responsibility (both Work Package 1 and 2). Grievances can be raised at no cost and anonymously. In order to identify and respond to GBVH grievances, NAT has committed to follow the guidance on "Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector", Siemens CoC, establishes the obligation to comply with international labour standards including a zero-tolerance policy with regards to "any unacceptable treatment of individuals such as mental cruelty, sexual harassment 	High	<ul style="list-style-type: none"> Include in the WMP mitigation measures in relation to GBVH²⁷. The strategy will include: <ul style="list-style-type: none"> In consultation with workers and their representatives, a workplace policy on violence and harassment will be adopted and implemented; Violence and harassment and associated psychosocial risks in the management of occupational health and safety will be taken into account; Hazards will be identified and the risks of violence and harassment will be assessed, with the participation of workers and their representatives, and to prevent and control them measures, such as ensuring access to clean, safe, secure and separate toilet and welfare facilities at work, will be taken. Lack of access can create or exacerbate health 	Low

²⁷ ESIA ESMP commitment

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
					or discrimination including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative".		<p>problems for workers as well as put them at risk of violence, including sexual violence;</p> <ul style="list-style-type: none"> • Workers and other persons will be provided concerned information and training, in accessible formats as appropriate, on the identified hazards and risks of violence and harassment and the associated prevention and protection measures, including on the rights and responsibilities of workers; and • Effective means of inspection and investigation of cases of violence and harassment will be ensured, including through labour inspectorates or monitoring. • Specific provisions will be implemented in the Project's Grievance Mechanism to manage grievances related to GBVH (e.g. the complainant will be able to communicate the grievance to a person of its preferred gender, for example, if a woman prefers to explain the grievance to another woman, that will be possible). <p>■ Ensure Gender Aspects are integrated in Final Design of trains and stations²⁸; adequate and private service facilities on trains, at stations and other Project facilities should be in place; Consistent lighting, sufficient security personnel and CCTV in the station as well as on the train, should be guaranteed.</p>	

²⁸ ESIA ESMP commitment

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
5.4	<ul style="list-style-type: none"> Influx and uncontrolled urban development 	<ul style="list-style-type: none"> Project Workforce Contractors, subcontractors and suppliers Surrounding communities Vulnerable groups 	<ul style="list-style-type: none"> Right to adequate standard of living Right to health Right of minorities Right to property and freedom of residence 	<p>Although workforce is expected to be mostly (85%) local Egyptians, mostly from the governorates that host the Project, the urban planning and the profile of the diseases will be potentially influenced, therefore the severity is considered to be 'medium'. Given the high number of people hired during the construction phase, influx impacts are likely.</p>	<ul style="list-style-type: none"> NAT's grievance mechanism will be made available for any internal and external stakeholders to raise project-related concerns, comments and questions, including all project phases, activities and components of the Project, and all contractors and subcontractors under NAT responsibility (both WP 1 and WP2). Grievances can be raised at no cost and anonymously. 	Medium	<ul style="list-style-type: none"> In order to limit disturbances related to the influx of outside workers into the Project area, the Employment Strategy and Recruitment Process will clearly communicate to stakeholders that local candidates will be prioritized to the fullest extent²⁹. Workforce, including contractors and subcontractors, will be provided with health awareness training, including hazardous works, a significant briefing of hygiene practices (such as hand washing), implementation of educational outreach to increase awareness of major communicable disease and how to protect against infection and about transmission routes and the symptoms of the communicable diseases of concerns (including STDs and COVID-19)³⁰. A Workforce Code of Conduct will be adopted³¹. 	Low
6. Land Rights and Resettlement								
6.1	<ul style="list-style-type: none"> Land dispossession and displacement 	<ul style="list-style-type: none"> Affected land right holders Vulnerable Groups 	<ul style="list-style-type: none"> Right to life Right to own property Right to adequate standard of living Right to food 	<p>Land acquisition for the Project may result in land dispossession and displacement and lead to increased loss of livelihoods, housing and food insecurity if not properly managed, the potential severity is therefore deemed as 'high'.</p>	<ul style="list-style-type: none"> NAT's grievance mechanism will be made available for any internal and external stakeholders (community members and affected landowners) to raise project-related concerns, comments and questions, including all project phases, activities and components of the Project, and all contractors and subcontractors 	High	<ul style="list-style-type: none"> Resettlement Action Plan (RAP) will be developed and implemented in line with the in line with the Resettlement Framework, RAP Scoping Report (ERM, December 2022). Egyptian requirements as well as applicable international standards³². 	Low

²⁹ ESIA ESMP commitment

³⁰ ESIA ESMP commitment

³¹ ESIA ESMP commitment

³² ESIA ESMP commitment

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
			<ul style="list-style-type: none"> Right to housing 	<p>The land acquisition process is governed by Egyptian law as well as applicable international standards, as committed in the Resettlement Framework for the HSR Project (ECS, April 2021). Egyptian law does not cover compensation for loss of income, only land and assets. The land acquisition of the Project RoW alignment falls within the scope of NAT's responsibilities.</p> <p>Lack of transparency in the implementation of national legal requirements on property expropriation, including with respect to eligible groups, asset inventory and valuation, and compensation disbursements, increases the risk of a human rights violation occurring.</p> <p>Also, as reported in the RAP Scoping Report (ERM, 2022), the vulnerable groups mentioned above may not be protected through national land compensation legislation without the provision by NAT of development assistance.</p> <p>Due to the scale of the potential impact to affected landowners and land right-holders, the severity is considered 'high'. There are several gaps between the Egyptian legal framework and IFC PS5, which could lead to violations of PAPs rights. Due to this, the likelihood of this impact is deemed as 'high likely'. The RAP Scoping Report (currently in development) will be providing a methodology for the RAP. In order to close those gaps. Considering the scale of the resettlement and land acquisition processes, it is potentially</p>	<ul style="list-style-type: none"> under NAT responsibility (both WP1 and 2). Grievances can be raised at no cost and anonymously. Resettlement Framework (ECS, 2021) for the HSR Project and RAP Scoping Report (ERM, 2021) 		<ul style="list-style-type: none"> A specific Grievance Mechanism Channel will be developed specifically to manage concerns regarding the RAP process. This Grievance Mechanism Channel will be managed by the teams in charge of the RAP. A separate database should be maintained by the Project to monitor these grievances³³. 	

³³ ESIA ESMP commitment

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
				'highly likely' that an impact on land possessions rights may occur.				
7. Rights of Vulnerable Groups								
7.1	<ul style="list-style-type: none"> ■ Treatment of vulnerable groups and potential presence in the Project Area 	<ul style="list-style-type: none"> ■ Migrant Workers ■ Women ■ Vulnerable groups 	<ul style="list-style-type: none"> ■ Rights of minorities ■ Rights to non-discrimination ■ Right to work ■ Right to adequate standard of living ■ Right to property and freedom of residence ■ Right to housing ■ Right to food ■ Right to health 	<p>There is a risk for vulnerable groups to be disproportionately affected by the adverse human rights impacts associated with the project, and the lack of a proper project design could impede or limit the accessibility of people with disabilities to trains and stations. Vulnerable groups might also be unable or less likely to access grievance mechanisms and might not be willing to raise their concerns due to fear of repercussions. Due to the scale, scope of the potential risk and irremediability these impacts may have for vulnerable groups, the severity would be considered 'high'. Considering baseline conditions and presence of vulnerable groups along the RoW, it is 'highly likely' that this impact occurs.</p>	<ul style="list-style-type: none"> ■ NAT's grievance mechanism is available for any internal and external stakeholders (including project workers directly employed and subcontracted) to raise project-related concerns, comments and questions, including all project phases, activities and components of the Project, and all contractors and subcontractors under NAT responsibility (both WP 1 and WP2). Grievances can be raised at no cost and anonymously. In order to identify and respond to GBVH grievances, NAT has committed to follow the guidance on "Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector". ■ Siemens CoC establishes the obligation to "ensure respect of all internationally proclaimed human rights by avoiding causation of and complicity in any human rights violations" with heightened attention for "specifically vulnerable rights holders or groups of rights holders such as women, children or migrant workers, or of (indigenous) communities" - applicable to WP2. ■ The Consortium Agreement includes Consortium Partners' obligation to comply to "seek ways to prevent or mitigate human rights violations that are directly linked to their business operation, products or services by a business relationship, even if they do not cause or contribute to those impacts, (paying) 	High	<ul style="list-style-type: none"> ■ Recommended mitigation measures specifically listed in more detail in 2.1, 2.3, 2.4, 4.3, and 5.1 in this table are intended to manage the impacts on vulnerable groups in relation to labour rights and working conditions, approach to recruitment, child and forced labour, GBVH and land dispossession and displacement. ■ Ensure that specific accessibility measures for vulnerable groups (in particular disabled people) are integrated in Final Design of trains and stations ■ Implement a SEP for the Project to ensure appropriate project disclosure and consultation with relevant stakeholders, including vulnerable groups. The SEP should outline how NAT will ensure regular, open and transparent communication with all stakeholders, using inclusive dialogue to build a shared understanding of the potential positive and negative impacts of the Project, and discuss the associated risks and opportunities. Specific efforts will be made to ensure participation of and disclosure to illiterate individuals, individuals with hearing or vision disabilities, individuals with limited mobility and the elderly who may not be able to get to venues of meetings. 	Medium

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
					heightened attention to the prevention or mitigation of adverse impacts on local communities and specifically vulnerable rightsholders" - applicable to WP2.			
8. Cultural Rights								
8.1	Impacts on Cultural Rights	<ul style="list-style-type: none"> Surrounding communities 	<ul style="list-style-type: none"> Right to take part in Cultural life Right to access public services Right to access and enjoy cultural and natural heritage 	<p>Although the impact is possible during both construction and operation, as the construction of the HSR itself will affect the severance of the communities and promote access restrictions, a range of management measures are in place to reduce the likelihood of an impact occurring. This includes the construction of crossings, bridges, over-passes and the elevation of the railway in some areas, avoiding the railway to be at grade and the impacts that it might suppose. In addition, most of the crossings will mainly be placed in villages and densely populated areas, where there is presence of cultural sites as mosques, churches, and sacred places, which are less likely to be located in uninhabited or deserted areas.</p>	<ul style="list-style-type: none"> As part of the Project, crossings, bridges, over-passes will be built, and the railway will be elevated in some areas avoiding the railway to be at grade and the impacts that it might suppose. This additional Infrastructure will be built in populated areas, where the cultural sites are normally located. NAT's grievance mechanism is available for any internal and external stakeholders (including project workers directly employed and subcontracted) to raise project-related concerns, comments and questions, including all project phases, activities and components of the Project, and all contractors and subcontractors under NAT responsibility (both WP 1 and 2). Grievances can be raised at no cost and anonymously. In order to identify and respond to any grievance related to the project, including community complaints. 	Low	<ul style="list-style-type: none"> The minimisation of severance impacts is one of the main issues that will be addressed by appropriate design of the Project: pedestrian crossings will be crucial for the accessibility of pedestrians and communities that will have the HSR passing through their neighbourhoods. Furthermore, pedestrian crossings will be required for the accessibility of some stations which are only accessible through one side of the alignment. MoT/ NAT GM will include a specific category for grievances referring to severance impacts during construction and operation phase of the Project, so that adequate response measures can be agreed with stakeholders and implemented. To ensure that safe road crossing options for pedestrians, bicycles, vehicles, animals, etc. has been designed and access to communal resources, land and infrastructure to business infrastructure is not lost, the Project will monitor this issue through regular engagement with local authorities and make the grievance mechanism available. Relevant grievances will be acted upon, and installation of additional crossings will be considered. 	Low

No	Potential Sources of Risks	Whose Rights at Risk	Rights at Risk	Risk Description and Assessment	Existing Management Measures	General Impact Rank	Additional Recommended Management Measures	Residual Impact Rank
9. Privacy Rights								
9.1	Impacts on Privacy Rights	<ul style="list-style-type: none"> ■ Workers ■ PAPs ■ Surrounding Communities 	<ul style="list-style-type: none"> ■ Right to Privacy ■ Right to be free from interference and intrusion ■ Right to respect for private life, the home and correspondence 	<p>There is a potential risk of failing to protect privacy rights during construction and operation, as the project will involve the collection of information from workers, stakeholders, and affected parties. However, some EPC contractors might have (Siemens and Orascom do) management measures which cover the implementation of fair operating practices, including data privacy.</p>	<ul style="list-style-type: none"> ■ NAT's grievance mechanism is available for any internal and external stakeholders (including project workers directly employed and subcontracted) to raise project-related concerns, comments and questions, including all project phases, activities and components of the Project, and all contractors and subcontractors under NAT responsibility (both Work Package 1 and 2). Grievances can be raised at no cost and anonymously. In order to identify and respond to any grievance related to the Project, including community concerns and questions about the processes of management of information in place. ■ The Siemens CoC Code of Conduct for Suppliers and Third-Party Intermediaries, ensure the implementation of fair operating practices, including data privacy - applicable to WP2. ■ Siemens CoC has a compliance management system in place that is based in three pillars (prevent, detect and respond), and covers Data Privacy and Human Rights between others - applicable to WP2. ■ Orascom Code of Business Principles and Orascom Code of Ethics cover stipulations related to data Privacy 	Low	<ul style="list-style-type: none"> ■ NAT will ensure that the Project-related processes that require management of information, including the SEP, the RAP and the Workers Management Plan and Recruitment and Employment Plan are collecting and managing the information in a proper manner, confidentially, transparently, and accessible. 	Low

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