

**The Environmental and Social Management System (ESMS) of Uzbektelecom
Joint Stock Company**

Tashkent

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Glossary

AIIB	Asian Infrastructure Investment Bank
E&S	Environmental and Social aspects
ESIA	Environmental and Social Impact Assessment A process aimed at identifying, predicting and assessing the potential environmental and social impacts of a proposed project before making key decisions or commitments; analyzing alternatives and developing appropriate mitigation, management and monitoring measures.
ESEL	Environmental and Social Exclusion List
ESMF	The Environmental and Social Management Framework (ESMF) becomes necessary only in cases where the measures required will be identified during the project implementation process. Once these measures are clearly defined, the ESMF outlines the necessary procedures for identifying and managing the environmental and social risks that may arise during implementation.
ESMP	Environmental and Social Management Plan A plan documenting the project's risk management strategy based on the findings of the Environmental and Social Impact Assessment (ESIA). The Environmental and Social Management Plan (ESMP) defines mitigation measures, as well as a timetable for their implementation, necessary resources and areas of responsibility. In addition, the ESMP includes provisions on training and advanced training, institutional mechanisms for the implementation of an environmental and social management system, as well as monitoring requirements.
IFC	International Finance Corporation
Investment project	A set of activities partially or fully funded by investors, banks, government or international funds to achieve economic, social or environmental goals
Recommendations of international financial institutions in the field of environmental and social management	When preparing this document, the requirements and recommendations of the IFC and AIIB in the field of environmental and social management system development were primarily taken into account.
EBRD	European Bank for Reconstruction and Development
World Bank (WB)	World Bank

1. Introduction

The present Environmental and Social Management System (ESMS) is a systematic procedure and workflow for the identification, assessment, planning, mitigation and management of environmental and social risks associated with Uzbektelecom JSC projects and operations.

The Environmental and Social Management System (ESMS) enables Uzbektelecom JSC to assess potential projects for environmental and social risks and to identify any negative impacts that may arise. It also supports the development of measures to prevent, minimize, or compensate for such impacts. Another key function of this system is to monitor the effectiveness of these mitigation measures during project implementation and to ensure continuous oversight to address any environmental or social consequences that may occur.

The development of this System is based on internationally recognized standards and principles of sustainable development and also considers the specifics of the national environmental and social policy of the Republic of Uzbekistan.

The Environmental and Social Management System (ESMS) includes the following elements:

1. Policy and objectives: forming commitments to minimize negative impacts on the environment and society.
2. Risk and impact assessment: identification and classification of environmental and social risks.
3. Risk management: development and implementation of measures to prevent or minimize negative impacts.
4. Monitoring and reporting: regular monitoring of the implementation of activities and reporting to stakeholders.
5. Feedback and improvements: Continuous improvement of the system based on the feedback received.

The objectives of the Environmental and social management System (ESMS) are:

1. To prevent the negative impact of investments on the environment and affected communities, and in cases where this is not possible, to minimize and mitigate such consequences.
2. Maximizing the benefits of environmental and social aspects (E&S).
3. Ensuring consistency of corporate and project policies and E&S management procedures at all stages, from project planning (the Company's management of these aspects of activities) to the commissioning of projects, ensuring their uniform implementation throughout the Company.
4. Formalize and strengthen existing E&S management processes and requirements in order to comply with national and local regulations, as well as ensure compliance with international financial institutions' standards and best international practices.

Within the framework of the ESMS, interaction with stakeholders occupies an important place in the management and mitigation of environmental and social risks, the Company undertakes obligations to inform, process appeals and/or complaints received from representatives of interested parties in order to timely review and provide feedback within the time limits stipulated by the legislative acts of the Republic of Uzbekistan, as well as internal Policy on interaction with stakeholders.

2. Purpose and scope of the ESMS

This ESMS was first developed for E&S management in Uzbektelecom JSC. This ESMS is designed to create a systematic approach to the identification, assessment, management and monitoring of environmental and social risks associated with the Company's activities.

Uzbektelecom JSC strives to improve its E&S management practices in all areas of the Company's business, including products and services. The main focus is on the following areas:

- Compliance with applicable environmental and social standards. Ensuring that the requirements for the proposed projects are met.
- Responsible financing. The projects are classified into two groups:
 - projects funded through financial institutions that are subject to verification for compliance with applicable standards (according to section 4);
 - mandatory (state) projects aimed at the development of the sector and the implementation of the development strategy of the Republic of Uzbekistan, which are implemented in strict accordance with internal regulations and national requirements.
- Integration of risk management. Consideration of environmental and social risks within the framework of the Company's internal risk management system.
- Transparency and consultation. Ensuring transparency by providing information to stakeholders about the progress of projects, as well as holding consultations with key stakeholders and experts to take into account their opinions and comply with established requirements.
- Cooperation with partners. Taking measures to interact with the management of Companies involved in projects to ensure compliance with environmental and social standards.

Applicable environmental and social requirements:

1. In its activities, Uzbektelecom JSC is guided by the requirements of the national legislation of the Republic of Uzbekistan, and also takes into account the best industry practices and recommendations of international financial institutions¹, regulators and applicable standards in the field of environmental protection, protection of the rights of vulnerable segments of the population, labor protection and safety, as well as regulation of interaction with contractors and service organizations.
2. The Company also takes into account the standards and recommendations of international financial institutions when implementing investment projects and projects aimed at developing the Company's business: projects implemented by the Company are checked for compliance with the environmental and social exemptions list (ESEL) in accordance with the list provided in Appendix 1.

This ESMS will be communicated to all employees, operators and participants of Uzbektelecom JSC projects, ensuring their involvement and compliance with established standards.

3. Organizational resources and responsibilities

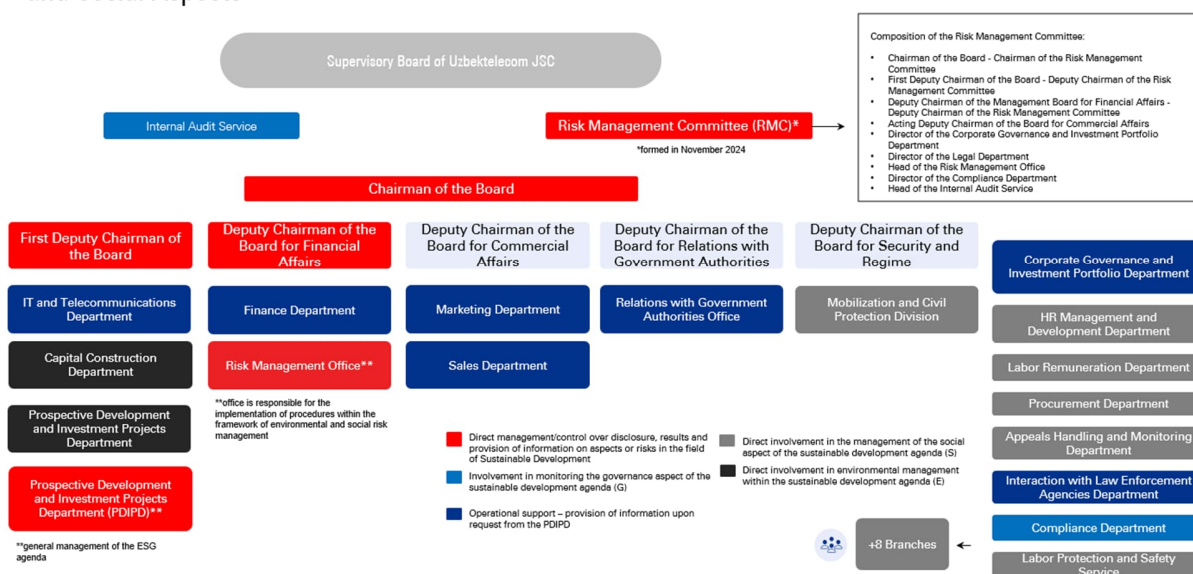
The Uzbektelecom JSC environmental and social management system is supervised by the Risk Management Committee at the corporate level, and the Risk Management Department at the operational level (Figure 1).

The main responsibility for the effective management of environmental and social risks and ensuring

¹ organizations that support sustainable development through standards, recommendations, and financing of investment projects, including recommendations from international financial institutions such as the EBRD and the World Bank on environmental and social aspects

The Risk Management Department plays a key role in coordinating the interaction between various departments during the assessment and management of environmental and social risks of the Company, while the overall management of sustainable development issues is managed by the Department of Transformation and Strategic Development.

Sustainability Issues Management Framework, including Environmental and Social Aspects

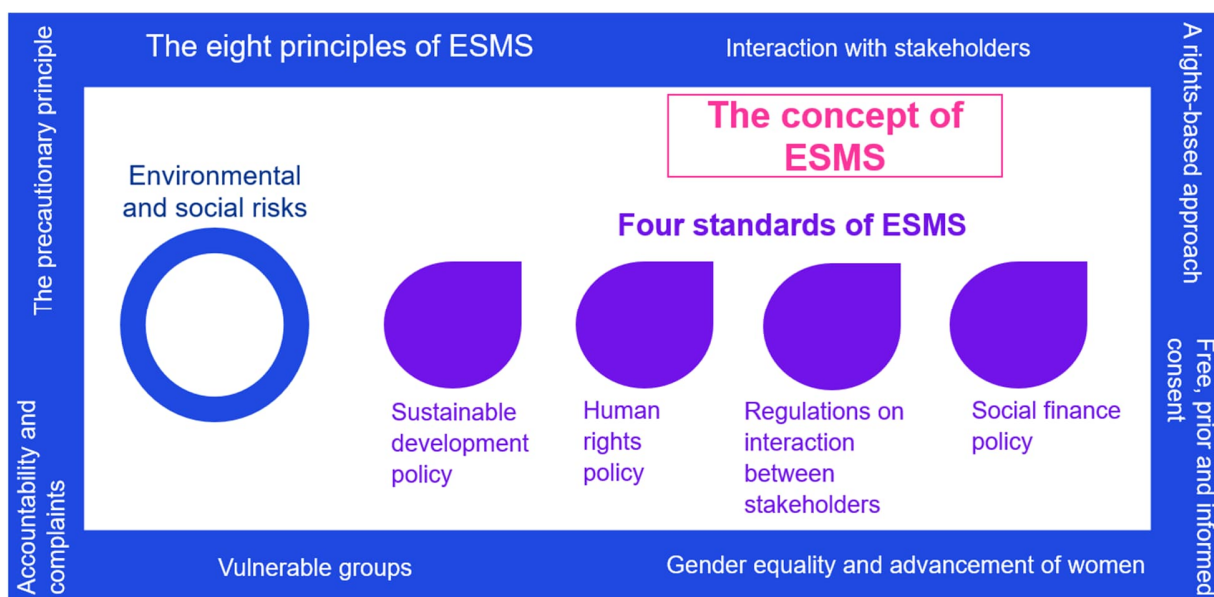


In 2024, the Company started implementing the principles of the Environmental and Social Management System (ESMS). The results of the System testing are presented in Appendix 2.

4. ESMS Policy Framework: standards, principles and risk areas

As shown in Figure 2, the ESMS policy is based on eight universal principles (highlighted in blue) and four key standards (highlighted in purple), which cover the main environmental and social aspects reflecting the approach of Uzbektelecom JSC.

Figure 2. ESMS Concept



The four ESMS Standards are published as separate documents:

1. Sustainable development policy.
2. Human rights policy.
3. Regulations on interaction with stakeholders.
4. Social financing policy.

The eight principles of the ESMS are:

1. Respect for human rights: Ensures that human rights are at the center of all policies and actions.
2. Protecting the needs of vulnerable groups: priority support for at-risk populations.
3. Gender equality and the advancement of women: promoting equal opportunities and supporting women in all aspects.
4. Stakeholder engagement: The active participation of all relevant parties in the decision-making process.
5. Free, Prior, and Informed Consent: Respecting the right of communities to make decisions knowingly, with full information, and without pressure.
6. Accountability and complaints: Establishing mechanisms for transparent accountability and tracking results.
7. The precautionary principle: the application of preventive measures in case of environmental or social risks.
8. International best practices for the telecommunications industry: monitoring global standards and innovative solutions to enhance the sustainability and competitiveness of the industry.

The principles of ESMS are defined within the framework of the environmental and social management system, while the principle of interaction with stakeholders, which is key in the process of risk identification and assessment, is presented in the form of a diagram. This is aimed at ensuring effective interaction with stakeholders, as well as facilitating participation and disclosure of information to the public at all stages of the process. The scheme is given in Appendix 3.

Risk areas specific to the telecommunications sector:

Environmental risks:

- Significant energy consumption and greenhouse gas emissions associated with the operation of base stations and data centers;
- Waste generation, including equipment and materials;
- Negative impacts on biodiversity caused by the installation of telecommunication towers.

Social risks:

- possible conflicts with local communities related to the location of infrastructure facilities;
- violations of workers' labor rights, including non-compliance with working conditions and safety requirements;
- limited access to communication services for vulnerable groups of the population.

In addition to the risks described above, the ESMS risk identification process is much broader and should cover the full range of potential environmental and social risks. Among them, there are 5 risk areas that are of particular importance for telecommunications projects, namely:

- risks related to public health, safety and security.
- labor and working conditions;
- resource efficiency, environmental pollution, waste, chemicals and GHG emissions;
- there is a risk that climate change will not be taken into account when developing the project.

5. Environmental and social risk management in the project cycle

The key stages of the environmental and social risk management process, as shown in Figure 3 below, are:

1. Pre-screening:

- An initial analysis of the project to identify potential risks and determine the need for further assessment.
- Classification of the project by risk levels (low, medium, high).

2. Screening:

- In-depth analysis to identify key environmental and social risks.
- Determining the scope of the assessment and the need for additional research.

3. Risk assessment:

- A detailed study of the identified risks, their probability and potential impact.
- Development of proposals on measures to reduce, eliminate or compensate for risks.

4. Approval:

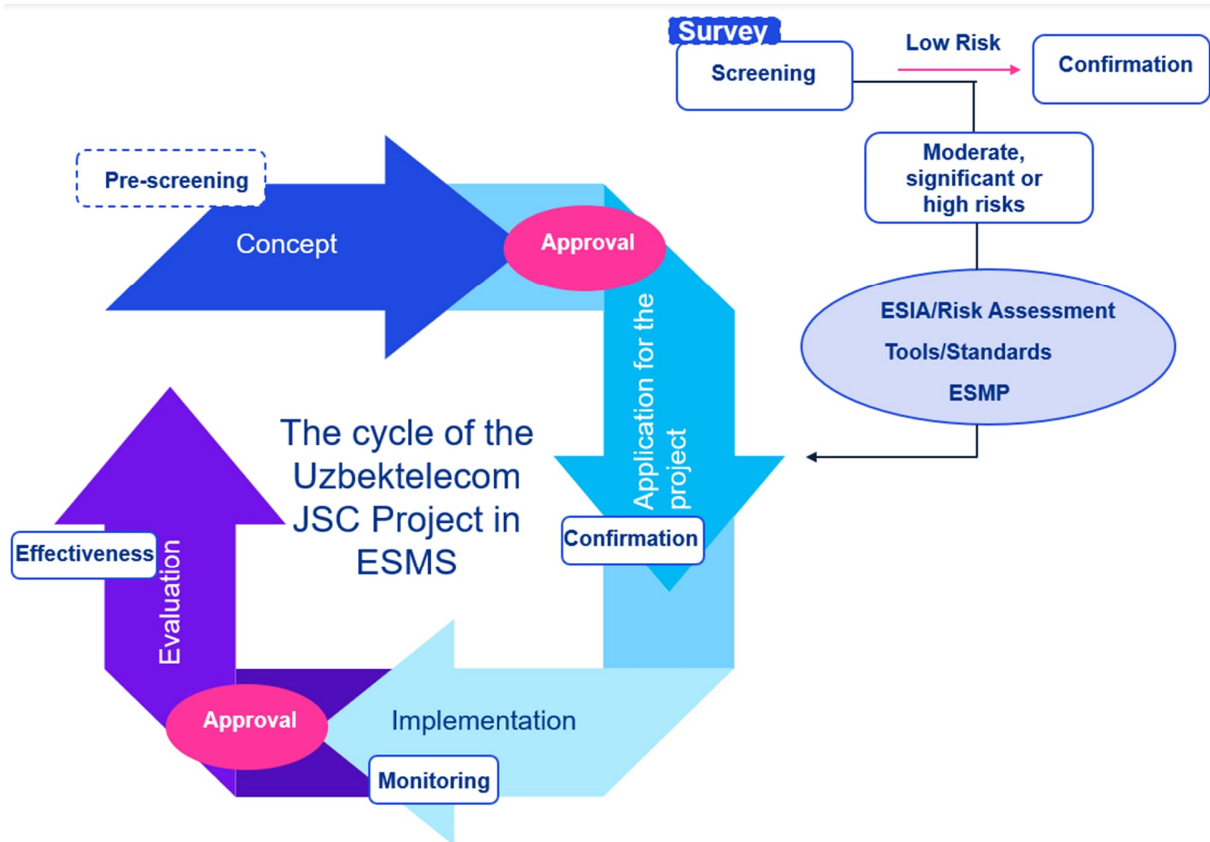
- Making decisions on the feasibility of the project, taking into account the proposed risk management measures.
- Coordination of the risk management plan with stakeholders.

5. Management, monitoring and evaluation::

- Implementation of risk management measures at all stages of the project.
- Continuous monitoring of the effectiveness of measures, data collection and analysis.

- Conducting regular audits and evaluating the achievement of sustainable management goals.

Figure 3. Stages of the environmental and social risk management process



5.1.ESMS Pre-screening

Pre-screening is an optional step and is recommended, in particular, for large Uzbektelecom JSC investment projects. The purpose of this step is to ensure that environmental and social aspects are included in the development of the project at an early stage.

Pre-screening is performed using a simplified version of the ESMS screening form, which does not contain the ESMS questionnaire (Appendix 5, without Table 9).

5.2.ESMS Screening

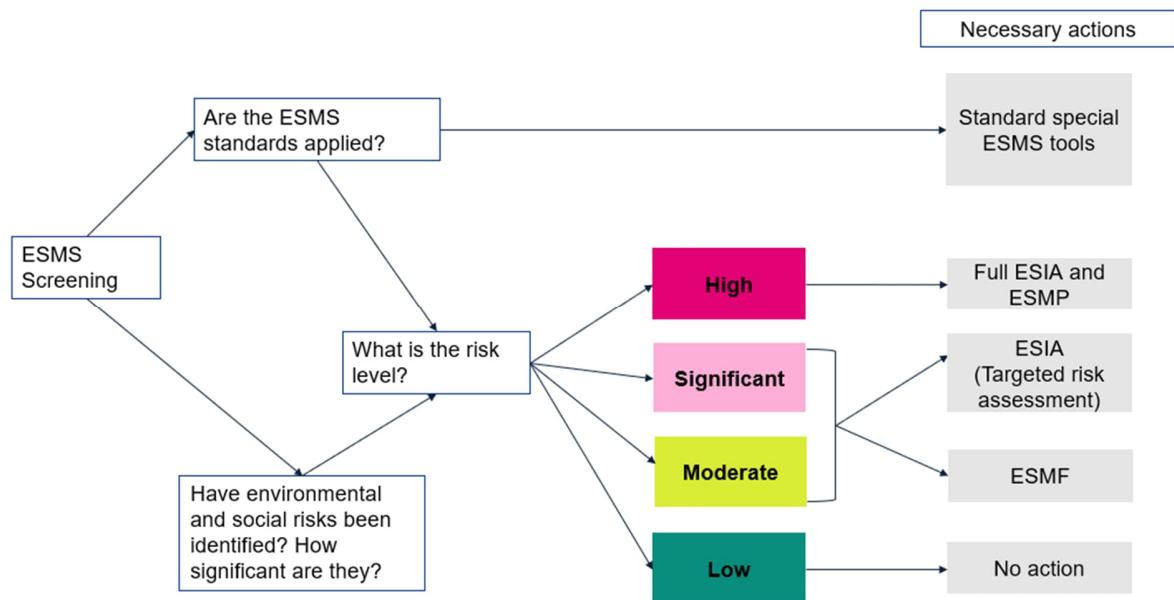
Review screening: timing, purpose, and solutions.

Screening is carried out immediately after the project has a sufficiently detailed design, the geographical area of the project, the main types of activities, as well as the likely stakeholders and beneficiaries are identified. The purpose of screening is to determine the project's risk level (low, moderate, significant, or high) based on the significance of the identified risks. Projects with moderate, significant, or high risk require further assessment, while projects with low risk do not require additional steps. Projects with moderate, significant and high risk require different types of assessments, which are determined during screening depending on the nature and extent of the identified risks.

According to the diagram below, screening leads to the following decisions:

- What are the environmental and social risks and what is their potential significance?
- Are any ESMS standards applied, or can they be applied?
- Based on steps 1 and 2, determine the project's risk level (low, moderate, significant, or high)?
- Based on steps 1-3, what type of assessment should be performed and what tools specific to this standard should be used?

Figure 4. ESMS Screening — Basic Solutions



Descriptions of ESMP tools (Environmental and Social Management Plan), ESMF (Environmental and Social Management Framework), ESIA (Environmental and Social Impact Assessment) from Figure 4 is given in paragraph 5.3. However, it should be noted that the ESMS does not consider the process of selecting an applicable standard, as this step will be detailed as part of the development of these documents.

Using the ESMS questionnaire to justify screening.

The screening is carried out using the ESMS screening questionnaire. The questionnaire consists of 4 sections as shown in Fig. 5 below².

²Note that the risk area "The risk that climate change will not be taken into account in the development of the project" is considered separately from the ESMS screening questionnaire, as it requires a different methodology

Figure 5. Structure of the ESMS Screening Questionnaire

A. Brief description of the project B. Social or environmental impact assessment: • Equality of women's rights and related risks • Risks of exposure to vulnerable populations • Risks of human rights violations • Risks to public health, safety and protection • Labor and working conditions • Resource efficiency, environmental pollution, waste, chemicals and GHG emissions C. Potential impacts related to standards: • Regulations on interaction with stakeholders • Human rights policy • Social financing policy • Sustainable development policy D. Compliance with ESMS principles Understanding to what extent the ESMS principles were followed during the development of the project (for example, the quality of interaction with stakeholders, consultations taking into account the rights and interests of women, etc.)
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How to determine the significance of individual environmental and social risk areas

At the end of each environmental and safety risk area, in section B of the questionnaire, the Uzbektelcom reviewer enters his assessment of the likelihood and expected impact (consequences) the corresponding risk area on a scale from 1 (low) to 5 (high). The same is done for each of the four standards in section C. The following methodology is used to compile the rating:

The probability is estimated in the following five categories:

- Very unlikely (1);
- Not expected (2);
- It is possible that will happen (3);
- It is most likely that will happen (4);
- It is highly likely that will happen (5).

Impact (or consequences) is the degree to which an event affects environmental or social objects and groups. To analyze it, the following factors must be considered:

- Sensitivity of environmental and social receptors — for example, territories with a high value of biodiversity, densely populated areas, areas with a significant influx of returning refugees.
- Magnitude of impact — how severe or extensive is the impact? Does it affect a large geographical area, a large number of people?
- Manageability — are tools and measures available to effectively mitigate the impact, have they been adopted by the culture, or does a detailed study need to be done to understand whether the impact can be managed and what management measures are needed?
- Duration — will the negative impact be short-term (for example, only during construction) or will it last for a longer period?
- Reversibility — is the impact reversible or irreversible?

The impact or consequences are assessed in five categories (estimates), which are defined in the table below based on the above factors:

Table 1. Impact assessment categories

Category	Definition
Critical (5)	Critical impacts on people and/or the environment of very large magnitude, including very large scale and/or spatial extent (large geographical area, large number of people, transboundary impact), cumulative, long-term (permanent and irreversible); recipients are considered highly sensitive; examples are serious adverse impacts in areas with high biodiversity value; serious adverse impacts on indigenous peoples' lands, resources and territories; significant levels of displacement or resettlement with long-term consequences for people's livelihoods; impacts lead to serious social conflicts with long-term consequences.
Strong (4)	Adverse effects on people and/or the environment of large magnitude, including large-scale and/or spatial distribution (large geographical area, large number of people, transboundary impact), of a certain duration, but still reversible if sufficient efforts are made to mitigate the consequences; recipients are considered sensitive; examples are adverse effects on areas with high the value of biodiversity; adverse effects on the lands, resources and territories of indigenous peoples; significant levels of displacement or resettlement with temporary consequences for people's livelihoods; the impact leads to social conflicts that are expected to have a limited duration.
Medium (3)	Adverse impacts of medium magnitude, limited in scale (small area and small number of victims), limited in duration (temporary), impacts are relatively predictable and can be avoided, controlled and/or mitigated using known solutions and simple measures.
Low (2)	Small-scale adverse impacts (for example, a very small, affected area, a small number of affected people) and short-term impacts that can be easily avoided, controlled and mitigated.
Insignificant (1)	Minor or no adverse effects on communities, individuals, and/or the environment.

The final assessment of the risk areas and compliance with ESMS standards is recorded in the summary table in the second step of the ESMS verification and approval template.

The assessment shows the significance of each risk area, determining the actions to be taken during the project implementation, as well as the level of impact and the type of protective tools to be applied in accordance with ESMS standards.

Table 2. Assessment of the significance of the risk

		Probability of occurrence`				
		Very unlikely (1)	Not expected (2)	Possible to occur (3)	Likely to occur (4)	Common occurrence (5)
Impact	Critical (5)	Medium	Material	High	High	High
	Strong (4)	Low	Medium	Material	Material	High
	Medium (3)	Low	Medium	Medium	Medium	Material
	Low (2)	Low	Low	Medium	Medium	Medium
	Insignificant (1)	Low	Low	Low	Low	Low

Completing the screening report and determining the risk category of the project

The definition of the project's risk category is carried out after the completion of the assessment of individual risk areas and compliance with four standards, which includes:

1. Taking into account the importance of individual risks and standards.
2. Assessment of compliance with ESMS principles during project development.
3. Analysis of the need and type of risk mitigation measures and protection tools.

As a result, the project is classified into one of four risk categories: Low, Moderate, Material or High.

Table 3. Characteristics of projects by four risk categories

Project risk category	Definition
High risk	High-risk projects are associated with potentially significant adverse environmental or social impacts that may be irreversible, large-scale, and affect sensitive areas or communities. These impacts often raise concerns among stakeholders and require a comprehensive assessment, detailed management plans, and extensive consultations. Standard mitigation solutions are not sufficient; specialized tools such as a Plan for the Protection of Indigenous peoples are needed.
Material risk	Projects with significant environmental and/or social risks and impacts that are limited to a specific area and less significant than those of high-risk projects, but more serious than those of moderate ones. Such projects may include individual issues with significant risk or several moderate risks that require individual environmental and social assessment. Protection tools may include a Reclamation Plan for the implementation of investment projects for the construction of facilities and the construction of infrastructure.

Moderate risk	Projects with environmental and social impacts that are less significant and numerous than those with high or significant risk. Such impacts are usually limited to the project area, predictable, rarely irreversible, and can be successfully eliminated by standard measures included in the Environmental and Social Management Plan (ESMP).
Low risk	Projects that have minimal or no environmental and social impacts, or whose risks have already been taken into account through pre-designed mitigation measures. No additional assessment is required for such projects. The screening report may provide recommendations for applying best practices from the ESMS standards to manage minor risks.

The results of the risk assessment process and the necessary actions are described in Figure 6.

Figure 6. The result of the risk assessment process



The difference between formal screening and self-assessment

Uzbektelecom JSC distinguishes between formal screening and self-assessment screening. Formal ESMS screening is conducted by one or two ESMS experts and is mandatory for all Uzbektelecom JSC projects with a project budget of more than 5,000,000 USD. For projects with a budget below this threshold, the initiator (a division of the Company) conducts a self-assessment in a separate form and independently verifies the project by filling out the screening questionnaire from Appendix 5. The questions are designed in such a way that the main risk issues can be understood intuitively.

For projects with a budget of less than 5,000,000 USD, where there are no risks or only low risks have been identified, the initiator submits comments to the screening form, justifying the Low Risk level, and this document serves as an ESMS authorization. In cases where the initiator has identified risk issues when filling out the ESMS questionnaire, the projects will be directed to undergo formal ESMS screening.

5.3. Impact assessment and risk management development

Projects with moderate, significant, or high levels of risk require a detailed assessment to analyze the risks and develop a risk management strategy. Mitigation is based on a "mitigation hierarchy": First, measures are taken to prevent negative consequences, then to minimize them, and the residual consequences are compensated if they cannot be avoided.

A full environmental and social impact assessment (ESIA) is required for all **high-risk** projects. A comprehensive ESIA includes a detailed assessment of all potential impacts of a project, starting with the scoping and planning phase. The key elements of the ESIA report are shown in Figure 7.

Features of the full ESIA:

- A special methodology is used for analysis and consultation with stakeholders, including the disclosure of preliminary reports to collect informed feedback.
- It includes interaction with affected parties and copyright holders at all stages of the process.

ESIA stages:

- analysis of the political, legal and administrative framework;
- collection of initial environmental and social data;
- forecasting and assessment of impacts;
- analysis of alternatives;
- Development of an Environmental and Social Management Plan (ESMP).

A complete ESIA is performed by external experts, usually a team of consultants.

Figure 7. Key elements of the ESIA report

Project Definition	Clearly and concisely present information about the project and its area of influence, including geographical, environmental, social and temporal aspects.
Analysis of the political, legal and administrative framework	Clarify the framework within which Environmental and Social Impact Assessment (ESIA) is carried out and ensure that the project complies with this framework.
Identification and analysis of stakeholders	Identify who should participate in the ESIA process, especially the groups that may be affected.
Environmental and social baseline data	Determine the starting point, including any changes expected without the implementation of the project.
Assessment of environmental and social impacts	Analyze social and environmental risks and accurately predict significant consequences.
Analysis of alternatives	Consider other options for achieving the project goals and compare the consequences, including the option of abandoning the project.
Environmental and social impact management Plan	Develop appropriate measures to prevent and minimize the consequences, as well as mechanisms to monitor their effectiveness.
Results of consultations with stakeholders	Understand the concerns of stakeholders and determine what is necessary to protect their rights and livelihoods.

For projects **with moderate or significant levels of risk**, a partial ESIA is conducted, also called a targeted assessment of environmental and social risks. This analysis follows the same structure as the full ESIA, but has a narrower scope, focusing on the key risks identified during the screening phase.

A partial assessment requires less time and resources but should be proportionate to the identified risks. In some cases, the assessment may focus only on social risks.

5.4. ESMS Monitoring and Reporting

Uzbektelecom JSC submits reports on the implementation of ESMS and environmental and social indicators of projects related to risks and impacts in the field of sustainable development in coordination with the international financial institution. For projects with significant risks, it is possible to involve qualified independent experts to verify and verify data on negative impacts and their elimination.

A project with significant risks is one where the risks are so significant that they can be irreversible, long—term, or difficult to manage, even with comprehensive measures. An example of such a project is the laying of a fiber-optic cable through a region with a specially protected natural area.

After the project is approved, the ESMS Manager:

1. Regularly coordinates with the project participants to ensure compliance with environmental and social standards.
2. Notify financial institutions of any identified violations or risks upon request.

The ESMS Manager is responsible for preparing reports on project performance, assessing their compliance with standards, and the effectiveness of the Grievance Redress Mechanism (GRM)³.

Uzbektelecom JSC records and monitors all serious incidents on such projects. The ESMS Manager must be informed about each serious incident. The level of detail depends on whether an official investigation or a legal procedure is underway.

Serious incidents are incidents that have caused damage to the environment or human health and/or attracted the attention of third parties (for example, a fire, explosion, chemical or oil spill, release of pollutants), including deaths, serious injuries (requiring emergency care or hospitalization), accidents with loss of working time (requiring more than one day off for recovery) and incidents related to compensation claims.

³ In the event that the project is financed by resources attracted from international financial institutions, the final environmental and social performance report (ESPR) is sent upon request to the relevant financial institution. A brief description of the ESPR is provided in Appendix 6.

6. Risk matrix (mitigation mechanisms)

Table 4. Risk matrix

Aspect	Factors leading to the violation (risk area)	Aspect management approach	Regulatory document and functional unit	The degree of risk assessment based on the primary diagnosis of ESMS ⁴
S (Social)				
1. The right to life, the right to health	- insufficient development of principles and implementation of tools in the field of occupational safety and health; - lack of regular training and briefing of employees on security issues; - lack of control over compliance with safety standards by contractors.	- proper selection, training, equipping and supervision of full-time and contract employees; - ensuring public health and safety in connection with the Company's activities; - There is a mechanism for filing and reviewing complaints from employees and the local community caused by concerns about the security system and security personnel.	- Human rights policy. - Policy on interaction with stakeholders. - The Company's internal regulations in the field of occupational safety and health. - Quality Management System (QMS). - ISO 9001, ISO 14001, ISO 45001.	Low
2. The right not to be subjected to forced labor	violation of labor laws.	- ensuring freedom of movement, the possibility of dismissal at will; - refusal to withhold identity documents or funds to retain employees.	- Labor legislation of the Republic of Uzbekistan. - Provisions of the employee's employment contract - Human rights policy.	Low
3. The right to privacy	unauthorized data collection and processing (for example,	development and implementation of a privacy policy;	- Labor legislation of the Republic of Uzbekistan. - The provisions of the	Medium

⁴ Conducted in accordance with the IFC methodology, November 2024

Aspect	Factors leading to the violation (risk area)	Aspect management approach	Regulatory document and functional unit	The degree of risk assessment based on the primary diagnosis of ESMS ⁴
	collecting employee location data without their knowledge); - leakage of personal information (for example, the publication of passport data or phone numbers in the public domain); - installing surveillance cameras without the consent of employees or local communities.	- restriction of access to data, control of their processing; - employee training in working with personal data.	employee's employment contract. Human rights policy.	
4. The right to fair and favorable working conditions	- violation of labor protection standards; - wage inequality; - forced or child labor.	- ensuring compliance with national and international labor standards (e.g. occupational safety and health); - development and implementation of employee training programs on occupational safety and workers' rights; - regular inspections and audits of working conditions at all facilities.	- The Labor Code of the Republic of Uzbekistan. - The Law "On Labor Protection". - The Law "On sanitary and epidemiological welfare of the population". - Housing Code of the Republic of Uzbekistan. - The Law "On Public Health Protection".	Low
5. The right to adequate living conditions	- forced relocation due to project activities; - deterioration of infrastructure (access to water, electricity, roads) in the project area.	- conducting a social risk and impact assessment prior to the start of the project; - Development and implementation of compensation and resettlement programs for affected residents; - investments in the	- The Labor Code of the Republic of Uzbekistan; - The Law "On Labor Protection". - The Law "On sanitary and epidemiological welfare of the population". - Housing Code of the Republic of Uzbekistan.	Low

Aspect	Factors leading to the violation (risk area)	Aspect management approach	Regulatory document and functional unit	The degree of risk assessment based on the primary diagnosis of ESMS ⁴
		development of local infrastructure, including roads, water supply and electricity networks; - organizing consultations with the local population to consider their interests and needs; - maintaining mechanisms for reviewing complaints and monitoring living conditions after the project implementation.	The Law "On Public Health Protection".	
6. The right to create inclusive opportunities	- lack of programs to create an inclusive environment for people with disabilities; - lack of adapted infrastructure (ramps, elevators, specialized equipment); - discrimination in employment based on gender, age, ethnicity, or disability.	- development and implementation of a policy of equal opportunities and inclusion; - conducting trainings for staff on issues of non-discrimination and inclusion; - conducting regular audits and monitoring compliance with the principles of inclusion.	- The Labor Code of the Republic of Uzbekistan. - The Law "On Social Protection of the disabled". - International standards (UN Convention on the Rights of Persons with Disabilities).	Low
E (Ecological)				
1. Resource efficiency (electricity, water, important raw materials, etc.)	- excessive consumption of energy and water; - lack of energy saving and water efficiency programs.	- introduction of energy- and water-saving technologies; - conducting audits of resource consumption; - creation of programs for the secondary use of raw materials.	- Environmental Code of the Republic of Uzbekistan. - The Law "On Energy Conservation".	Medium

Aspect	Factors leading to the violation (risk area)	Aspect management approach	Regulatory document and functional unit	The degree of risk assessment based on the primary diagnosis of ESMS ⁴
2. Greenhouse gas (GHG) emissions	lack of emission control.	- switching to renewable energy sources; - development of carbon footprint reduction programs.	- The Paris Agreement. - Environmental Code of the Republic of Uzbekistan.	Medium
3. Hazardous and non-hazardous waste	- accumulation of waste without recycling; - non-compliance with disposal standards; - Low level of reuse of materials.	- development of recycling and recycling programs; - control over the transportation and storage of waste.	The law "On Waste".	Medium
4. Development of forest lands or wetlands	- deforestation for construction; - drainage of swamps, destruction of ecosystems.	- environmental impact assessment (EIA). - development of compensation measures (planting forests, restoration of territories).	- The Law "On Forest Protection". - Environmental Code of the Republic of Uzbekistan.	Low
5. Drought, rising temperatures	- reduction of natural reservoirs due to changes in landscape and climate; - territorial features of the climate, natural temperature rise in the region.	- assessing the impact on water resources before the start of the project; - developing climate change adaptation plans; - shorter working hours during hot hours and additional breaks.	- The Law of the Republic of Uzbekistan "On water supply and sanitation". - Environmental Code of the Republic of Uzbekistan.	Medium
6. Soil erosion	wind erosion without sufficient soil protection; disturbance of the landscape due to construction and production work.	application of anti-erosion soil treatment technologies; strengthening slopes and preventing landslides; monitoring of land resources and control over their use.	- The Law "On Forest Protection". - Environmental Code of the Republic of Uzbekistan.	Medium
Climate				
1. Floods	incorrect location of	Mapping risk zones to select safe locations for towers; Climate risk-	The Law of the Republic of Uzbekistan "On Water and	Medium

Aspect	Factors leading to the violation (risk area)	Aspect management approach	Regulatory document and functional unit	The degree of risk assessment based on the primary diagnosis of ESMS ⁴
	infrastructure (in lowlands or areas with poor drainage), lack of consideration of climate risks in planning.	based infrastructure design (e.g. tower hoisting, cable protection); The use of waterproof equipment and backup power sources.	Water Use" Decree of the President of the Republic of Uzbekistan No. UP-6024 "On approval of the Concept of water Management development for 2020-2030" Decree of the President of the Republic of Uzbekistan from 18.11.2022 No. PP-426 "On improving the efficiency of work to protect the population from emergencies"	

The functional units responsible for the analysis and updating of the risk matrix are the Risk Management Committee and the Risk Management Department.

For more information about physical climate risks, see Appendix 7.

7. Appendices

7.1. Appendix 1. An environmental and social exceptions list and requirements of the AIIB

Projects that will not be funded include the following:

Table 5. List of AIIB environmental and social exclusions

№	Name
1.	Forced labor or harmful or exploitative forms of child labor.
2.	Production or trade of any product or activity that is considered illegal according to national laws or regulations of the Participant in whose territory the Project is located, or international conventions and agreements, or subject to international phase-out or bans, for example:
2.1.	manufacture or trade of products containing polychlorinated biphenyl (PCBs).
2.2.	production or trade of pharmaceuticals, pesticides/herbicides and other dangerous substances subject to international phase-out or bans (Rotterdam Convention, Stockholm Convention).
2.3.	production or trade of ozone-depleting substances subject to international phase-out (Montreal Protocol).
3.	Wildlife trade or the production or trade of wildlife products regulated by the Convention on International Trade in Endangered Species of Wild Fauna and Flora.
4.	Transboundary movement of waste prohibited by international law (Basel Convention).
5.	Manufacture or trade of weapons and ammunition, including paramilitary materials.
6.	Production or trade of alcoholic beverages, with the exception of beer and wine.
7.	Tobacco production or trade.
8.	Gambling, casinos, and similar businesses.
9.	Manufacture, trade, or use of asbestos fibers, whether bound or not
10.	Activities prohibited by the legislation of the Participant in whose territory the Project is located, or by international conventions related to the protection of biodiversity or cultural resources, such as the Bonn Convention, the Ramsar Convention, the World Heritage Convention and the Convention on Biological Diversity.
11.	Commercial logging operations or purchase of logging equipment for use in primary tropical moist

	forests or old-growth forests.
12.	Production or trade of timber or other forest products, except for forests where sustainable management is conducted.
13.	Marine and coastal fishing methods, such as large-scale pelagic drift-net fishing and small-scale net fishing, harming vulnerable and protected species in large numbers and damaging marine biodiversity and habitats.
14.	Shipment of oil or other hazardous substances in tankers that do not comply with IMO requirements (IMO, MARPOL, SOLAS and Paris MOU).
15.	Thermal coal mining, coal-fired power plants and heating installations, or projects functionally related to coal.

Requirements of the ESS 1-3 AIIB:

Table 6. Requirements of the AIIB

	Goal	Application	Requirements
ESS 1: Environmental and social sustainability	Ensuring the environmental and social sustainability of projects, integrating environmental and social aspects into the decision-making process and project implementation.	The standard applies to projects with potentially adverse environmental and social risks and impacts.	Conducting a detailed environmental and social assessment for any project funded by the Bank.
ESS 2: Involuntary resettlement	Project-related resettlement process management, minimizing negative impacts on the affected population.	Projects involving forced resettlement, including: Physical displacement: loss of residential land or shelter. Economic displacement: loss of land, assets, or livelihood.	Development and implementation of a resettlement plan, including compensation and restoration of living conditions.
ESS 3: Indigenous peoples	Protection of the rights and interests of indigenous peoples who may be affected by the project.	Projects implemented in places where indigenous peoples are present or have a collective attachment to these territories.	Development of a plan for interaction with indigenous peoples, taking into account their cultural and social characteristics. Ensuring the participation of indigenous peoples in decision-making affecting their interests.

7.2. Appendix 2. Testing of the Environmental and Social Management System (ESMS)

7.3. Appendix 3. Scheme of the Grievance Redress Mechanism (GRM)

7.4. Appendix 4. Template: Environmental and Social Management Plan (ESMP)

Table 7. The ESMP template

Template: Environmental and Social Management Plan (ESMP)				
ESMS Standards	Involved	The main issues, ways to solve them, and the need to prepare a separate plan		
Human rights policy	☐ yes ☐ no ☐ TBD			
Regulations on interaction with stakeholders	☐ yes ☐ no ☐ TBD			
Social financing policy	☐ yes ☐ no ☐ TBD			
Sustainable development policy	☐ yes ☐ no ☐ TBD			
	Actions to comply with ESMS policies and regulations		Expenses	Responsibility for implementation Schedule

Information disclosure requirements					
Grievance redress mechanism					
Strengthening women's rights and opportunities					
Interaction with stakeholders					
Key social and environmental impacts and related mitigation measures					
Environmental and social impacts	Probability*	Mitigation measures	Expenses	Responsibility	Schedule
Disruption of ecosystems and biodiversity during the construction and installation of linear infrastructure (cables, access roads) on previously undeveloped lands	Low			Branch	
The threat of bird collisions with communication towers due to their height, construction and location	Low			Branch	
Landscape change and possible negative perception from the local community	Low			Branch	

Generation of hazardous waste	Medium	The Company's waste disposal policy is currently under development and will be approved by the end of 2025.		Risk Management Department	
Increased dust and movement restrictions during excavation work	Low			Branch	
Noise pollution and emissions from backup generators, cooling systems, and vehicles	Low			Branch	
Potential health effects from exposure to electric and magnetic fields (EMF)	Low			Branch	
Threats to construction site workers	Medium	Employees are allowed to perform production tasks only if they comply with mandatory requirements, including: • passing the medical commission • familiarization with the methods of safe work Special clothing and personal protective equipment are provided for certain categories of employees, depending on their job responsibilities.		Occupational Safety and Industrial Safety Service	

New ESMS Risks					

*If the probability of risk is low, then the risk is monitored and controlled at the branch level, which ensures timely response and management of E&S.

7.5. Appendix 5. ESMS Screening Report

Project Data

Table 8. ESMS Screening Report

Project Name:			
Initiator of the project:			
Contractor:			
Financing agency:			
Project start date and duration:			
Country:		Contract price:	
Has there been a previous safety check or ESIA?	☐ yes ☒ no	Details, if conducted:	
	Name and position of the person representing the initiator of the project		Date
ESMS Questionnaire is completed:			
The ESMS screening is	1. ☒ necessary because the project budget is $\geq 5,000,000$ USD 2. ☐ required – despite the fact that this is a small project ($< 5,000,000$ USD), the initiator of the project has identified risks when filling out the ESMS questionnaire 3. ☐ not required, as the project budget is $< 5,000,000$ USD and the initiator of the project confirms that no environmental or social risks were identified when filling out the ESMS questionnaire		

ESMS Screening Report

	Name	Division and function in Uzbektelecom JSC	Date
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The ESMS Reviewer:			
	Heading		Date
Documents submitted to the Screening stage:			
Risk Category:	☐ Low risk ☒ Medium risk ☐ High risk		
Justification:	(example) The project is assessed as moderately risky. The planned activities are expected to be positive for the environment, as they are aimed at reducing climate risks caused by climate change. The social effects are also expected to be beneficial: the activities are aimed at strengthening local capacities, as well as supporting vulnerable groups. Special attention is paid to the integration of local traditional knowledge and practices. Given that the project involves the provision of small and medium-sized soils mainly to indigenous communities, its overall risk is classified as moderate. To reduce risks, it is necessary to develop an Environmental and Social Management Framework (ESMF), which will include environmental and social risk assessment procedures for each grant, as well as define roles and responsibilities in the verification process and conduct the necessary assessments.		
Required assessments and tools	☐ Complete Environmental and Social Impact Assessment (ESIA) ☐ Partial Environmental and Social Impact Assessment (ESIA) ☒ Environmental and Social Management Plan (ESMP) ☒ Environmental and Social Management Framework (ESMF) ☐ Other: social and organizational assessment at the start of the project		
Necessary actions to protect and strengthen women's rights	(Example) A gender plan will be created that takes into account the experiences of local peoples. It will be developed taking into account cultural traditions and the specificities of power in local communities.		
ESMS Standards	Is used in the project	Necessary tools or plans	
Sustainable development policy	☐ yes ☒ no ☐ TBD		
Human rights policy	☒ yes ☐ no		

	☐ TBD	
Regulations on interaction with stakeholders	☐ yes ☒ no ☐ TBD	
Social financing policy	☐ yes ☒ no ☐ TBD	

Table 9. ESMS Screening Questionnaire

Potential impacts related to ESMS standards			
A1: Sustainable development policy			
	The initiator of the project		The ESMS Reviewer
	Yes; No; TBD.	Please answer the question and provide additional information if necessary.	Comments
1. If the project is aimed at building or modernizing infrastructure, is there a risk of negative impact on the environment or biodiversity in the project area?			
2. If the project includes waste management measures, are recycling, disposal or waste minimization systems provided to reduce the environmental impact?			
3. Is there a risk of ecological imbalance (e.g. soil degradation, water pollution) as a result of the project?			
4. Will the project lead to increased consumption of energy, water or other natural resources? If yes, are there any measures for their rational use?			

5. Are there plans for regular monitoring and reporting on key indicators of sustainable development (e.g. emissions, resource management, social impact)?			
Conclusion of the ESMS Reviewer on Sustainable Development Policy			
The standard is used in the project? Yes / No / TBD- Explain why			
A2: Human rights policy			
	The initiator of the project		The ESMS Reviewer
	Yes; No; TBD.	Please answer the question and provide additional information if necessary.	Comments
1. How does the Company ensure that there is no discrimination or encroachment on human dignity based on gender, age, nationality, religion or disability within the framework of the project?			
2. What mechanisms are in place to identify, analyze, and assess the risks of human rights violations during project implementation?			
3. What measures are provided to ensure the confidentiality of personal data of customers, employees and other interested parties in accordance with the legislation?			

4. Is it planned to train employees and partners on human rights issues and create a culture of zero discrimination?			
Conclusion of the ESMS Reviewer on Human Rights Policy			
The standard is used in the project? Yes / No / TBD- Explain why			
A3: Regulations on interaction with stakeholders			
		The initiator of the project	The ESMS Reviewer
	Yes; No; TBD.	Please answer the question and provide additional information if necessary.	Comments
1. What measures are envisaged for regular interaction and consideration of the views of stakeholders (local communities, government agencies) in the implementation of the project?			
2. How will the mechanism for filing, reviewing and resolving complaints from the local population and other stakeholders be organized?			
3. What steps are planned to inform stakeholders about the environmental, social and economic aspects of the project in a timely manner?			
4. How does the Company monitor compliance with ethical principles and legislation by suppliers and contractors involved in the project?			

5. Which structural divisions of the Company will be involved to coordinate interaction with local communities and key stakeholders?			
Conclusion of the ESMS reviewer on the Regulations on Interaction with Stakeholders			
The standard is used in the project? Yes / No / TBD- Explain why			
A4: Social financing policy			
		The initiator of the project	The ESMS Reviewer
	Yes; No; TBD.	<i>Please answer the question and provide additional information if necessary.</i>	<i>Comments</i>
1. Is the Company planning to participate in supporting charitable or community initiatives within the framework of the project?			
2. How is transparency and documentation of all payments for charitable purposes and sponsorship in the project ensured?			
3. What control mechanisms exist to eliminate conflicts of interest in the provision of gratuitous assistance?			
4. What measures have been taken to comply with the prohibition on using gratuitous aid in order to gain unreasonable competitive advantages?			
5. Are employees encouraged to participate in charitable initiatives, and how does this align with the interests of the Company?			

Conclusion of the ESMS Reviewer on Social Financing Policy			
The standard is used in the project? Yes / No / TBD- Explain why			
B. Other social or environmental impacts			
B1: Social impacts			
	The initiator of the project		The ESMS Reviewer
	Yes; No; TBD.	Please answer the question and provide additional information if necessary.	Comments
1. Is there a risk that the project will affect the health and safety of the community (including the risks of disease spread, conflicts between humans and wildlife)?			
2. Is there a risk that the project creates or exacerbates inequality between women and men or negatively affects the situation or living conditions of women?			
3. Is there a risk of relocation of people or restrictions on their economic activities due to the implementation of the project?			
4. Has the subproject company had any community violations regarding environmental and social indicators over the past 5 years in accordance with national legislation?			
B2: Environmental impacts			
	The initiator of the project		The ESMS Reviewer

	Yes; No; TBD.	Please answer the question and provide additional information if necessary.	Comments
1. What measures are envisaged to prevent accidents and environmental incidents within the framework of the project?			
2. Are there any legal requirements for environmental impact assessment in the host country that the project must meet?			
3. Can the project lead to air pollution or create other inconveniences such as dust, traffic, noise or odor?			
4. Are there measures for land reclamation after completion of construction or production work to restore their original condition?			
Conclusion of the ESMS examiner on other social or environmental impacts			
Are there any significant negative social or environmental risks expected?			
B: Climate change risks (risks caused by the inability to adequately account for the impacts of climate change on humans and the ecosystem)			
	The initiator of the project		The ESMS Reviewer
	Yes; No; TBD.	Please answer the question and provide additional information if necessary.	Comments
1. Have the climatic and physical risks in the project area been analyzed? If yes, what risks have been identified?			

2. What measures can be implemented to reduce climatic and physical risks?			
3. Could the project potentially increase the vulnerability of local communities/ecosystems to current or future climate changes?			
ESMS Reviewer's Conclusion on Climate Change Risks			

7.6. Appendix 6. Scheme of the Environmental and Social Performance Report (ESPR)

A. Detailed description of the project:

During the reporting period, please provide brief information about your current and planned operations, where applicable:

Table 10. Summary of subprojects.

I. Project	Short description	From the moment of commissioning (MM/Y)	ES categorization	Any unresolved issues in the field of environmental protection and involuntary resettlement during the reporting period and actions taken to resolve them
1. [location]				
2. [location]				
3.				
II. Projects under construction/under consideration	Short description	Planned date of commissioning (MM/YY)	ES categorization	Any unresolved issues in the field of environmental protection and involuntary resettlement during the reporting period and actions taken to resolve them
1.				
2.				
3.				

C. Progress in the implementation of gender measures. Discuss the progress of gender measures, as well as information on new measures, if any.

D. Complaint mechanism. Discuss the implementation of the GRM, issues/complaints received during the period and actions to address them, the status

of remaining issues/actions from the last reporting period.

E. Information about new subprojects using AIIB facilities

During the reporting period, please provide the following information about each of the company's AIIB-funded subprojects under implementation:

Company/Subsidiary name:	
Subproject name	
Subproject Location:	
Total cost of the subproject:	
Total funding from AIIB (USD million):	
ES category:	
Have any environmental and social checks been carried out in your organization? What environmental and involuntary resettlement issues related to this subproject were identified during the comprehensive audit conducted by your organization or audit reports on the subproject, and how were these issues resolved (i.e., the results of the comprehensive audit)?	If yes, please provide information about due diligence activities, such as desk review of warranty documents and on-site visits, and by whom they were conducted.
Have any environmental and social assessment reports (including the environmental and social management plan) or environmental and social audit reports been reviewed by your organization or prepared for this subproject?	If yes, specify the names of the reviewed documents.
What were the environmental and involuntary resettlement issues associated with this subproject that were identified through due diligence conducted by your organization or audit reports on the subproject, and how were the issues dealt with (i.e., outcome of due diligence)?	
For each subproject, did (Project/Borrower's staff responsible for implementing the ESMS) assist the subsidiary company to comply with the applicable environmental and social safeguards requirements and their implementation?	If yes, please describe it briefly.
Were safeguards related documents such as ESMP, RP, or E&S audit reports made publicly available, in addition to posting on AIIB's website?	If yes, specify the link to the website and the date when the documents were uploaded.
Have any conditions or packages related to environmental and social issues been concluded along with the investments?	If yes, please describe it briefly.

Does the subproject meet the applicable government requirements?	
Does the subproject meet the applicable AIIB warranty requirements?	
Information about employment: Employment of subproject personnel (total; men; women) Seasonal employment within the framework of the subproject and side work (total; men; women) Employment in construction within the framework of the subproject (total; men; women)	

Describe the measures taken by the Company to ensure that the contractors of the subproject and other suppliers of goods and services: (i) do not use child labor⁵ or forced labor;⁶ (ii) have appropriate management systems in place to enable them to work in accordance with national labour laws and to express dissatisfaction with and defend their rights regarding working conditions and conditions of employment.	
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⁵ Child labour means the use of children whose age is below the legal minimum age for work in the relevant country, or the use of child labour in violation of International Labour Organization Convention No. 138 "Minimum Age Convention" (www.ilo.org).

⁶ Forced labor is any work or service that is not performed voluntarily, that is, extracted from people under threat of force or punishment.

Proposed environmental and social monitoring report plan for the subproject (attached to the ESPR)

1. Name of the subproject and brief information

- (i) The name and location of the subproject/enterprise
- (ii) Scale/size/capacity
- (iii) The reporting period covered by this monitoring report (month/year)
- (iv) Indication of the project stage and date of commencement of operation (design, construction, operation or closure stage)
- (v) Key events and any significant changes in the location and design of the project, if there are some

2. Relevant environmental permits or certificates of conformity

- (i) Issued by a government agency(s) (specify the name of the institution)
- (ii) Dates of issue and period of validity
- (iii) A brief description of the conditions and requirements for the renewal of the permit
- (iv) Other standards and/or certificates (e.g. ISO 14000 environmental management systems and standards)

3. Land acquisition and involuntary resettlement

- (i) The impact of the subproject in relation to land acquisition and the measures taken.

4. Issues related to violation or non-compliance with requirements

- (i) The nature of the nonconformity
- (ii) The environmental standard or specification has not been met
- (iii) Date of registration and responsible authority/agency
- (iv) Public or media reaction (if any)
- (v) Corrective actions, target dates/deadlines, identification of responsible persons
 - (a) Short-term: remedial measures
 - (b) long-term: preventive measures

5. Complaint review mechanism

- (i) Date of creation and description of organizational mechanisms
- (ii) Complaints, claims or protests received from the local population, indicating the dates and organizations involved in their consideration, actions taken to resolve the claims; any unresolved issues and proposed measures to resolve them
- (iii) The nature of the labor dispute or claim (company employees and employees of contractors/subcontractors)
- (iv) Authorities responsible for investigation/recording
- (v) Media or public reaction (if any)
- (vi) Corrective actions, deadlines, identification of responsible persons; and

6. Working conditions and health and safety protection at the workplace and in society

- (i) The number of employees and employees of the company and compliance with national labor laws; the number of employees employed by contractors and subcontractors, and their compliance with national labor laws. Describe how the company monitors compliance with the requirements. If inconsistencies have been noticed or reported, what measures have been taken to bring the subproject in line with the requirements.
- (ii) Conducted training programs
- (iii) Incidents⁷ are recorded, including the date, extent of damage and injuries⁸ if any; authorities responsible for investigation/registration, and media or public reaction, if any; actions taken in response to the incident; as well as any outstanding issues and proposed measures.
- (iv) Other occupational health and safety measures or awareness-raising activities
- (v) Corrective actions, target dates/deadlines, identification of responsible persons
 - (a) Short-term: remedial measures
 - (b) long-term: preventive measures

6. Gender. Provide updated information/progress on indicators/activities outlined in the Gender Action Plan. Describe all the actions of the company/subproject on gender issues that contribute to improving the well-being and opportunities of women.

⁷Including incidents that have caused damage to the environment or human health, and/or attracted the attention of third-party organizations (for example, fire, explosion, chemical or oil spill, release of pollutants).

⁸ This includes deaths, serious injuries (requiring emergency treatment or hospitalization), accidents involving loss of working time (requiring more than one day off to recover), as well as incidents involving compensation claims.

7. Environmental management potential (subproject/site level)

- (i) Number of employees, qualifications and work experience in the field of environmental management (Please provide a diagram of the organization at the enterprise level)
- (ii) Awareness of: (i) environmental issues, (ii) occupational health and safety, (iii) national environmental laws and regulations, and (iv) applicable AIIB requirements for environmental safeguards
- (iii) Conducted training programs
- (iv) Assessment of environmental management capacity needs (including planned capacity-building programmes)

8. Consultations with stakeholders

- (i) Details of information disclosure and consultations, if any, with affected individuals, local communities, civil society groups, and other stakeholders
- (ii) Details of the approach/methodology to solving the problems and issues raised during the consultations
- (iii) Describe the efforts/initiatives to develop community relations and local development for the relevant stakeholders/residents of the project area.

9. Compliance with applicable environmental and social safeguards requirements

Implementation of an Environmental and Social Management Plan (ESMP) and a Corrective Action Plan (indicating changes to the ESMP, if necessary) during the construction or operation phase, with an emphasis on mitigation measures and a monitoring program.

10. Other information and reviews/brief evaluation of the work

Please list any other information that the Bank should be aware of. This may relate to broader environmental issues, community initiatives in your company, positive media or NGO attention, training activities, management system initiatives, or cost savings.

7.7. Appendix 7. Climate risks

Aspect	Detailed description of climate risk	Risk management
Droughts	Constant droughts lead to a decrease in water resources and deterioration of conditions for the rural regions in which the Company operates.	Transition to cooling systems with minimal use of water; reuse of water; installation of monitoring systems; placement of facilities in less vulnerable regions; use of energy-efficient technologies and reservation of alternative water resources.
Temperature rise	The gradual increase in temperature has a long-term impact on the climate and the general health of the population.	Use of energy-efficient cooling systems; integration of solar panels and other alternative energy sources to reduce dependence on traditional energy supply systems and increase resistance to temperature fluctuations.
Soil erosion	Prolonged land use and uncontrolled irrigation lead to gradual soil erosion, which worsens conditions for agriculture and economic activity in the regions where the Company operates.	Protection of underground and surface communications (for example, cables and communication towers) using barriers that strengthen the soil and create stable foundations for objects; landscaping and restoration of vegetation around objects to prevent erosion.
Floods	Floods pose a significant climatic risk to the Company's assets, as they can lead to flooding of infrastructure and serious damage to equipment.	Creation of backup copies of data; installation of equipment in secure locations; sealing of cable networks; implementation of water level monitoring and operational notification systems.
Increased humidity and precipitation	Humidity and precipitation can affect the reliability of equipment and cable networks, especially in areas with high precipitation levels.	Sealing and waterproofing of cable networks; installation of drainage systems; implementation of water level monitoring and operational notification systems.
Dust storms	Dust storms: can seriously degrade air quality, harming human health, rural regions of Uzbekistan where the Company operates, disabling the Company's equipment	The use of sealed structures and technologies capable of minimizing the impact of dust on equipment, regular maintenance to remove dust and prevent damage; regular replacement and updating of filters in ventilation systems.

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