

Los Portales
Environmental and Social Action Plan (ESAP)

Item	Reference	Action	Deliverable	Deadline
PS 1: Assessment and management of environmental and social risks and impacts				
1.1	Environmental and Social Management System	Optimize and maintain at all times an Integrated Environmental, Social, and Health and Safety Management System in accordance with Performance Standard 1 (PS 1) of the International Finance Corporation (IFC) applicable to all activities developed by the company's own and contracted personnel.	Environmental and Social Management Plan Document.	Nov-30-2019
		The company's health, safety, and environmental specialist will be responsible for the development, implementation, and monitoring of the environmental, social, and health and safety management plans, programs, and procedures, including the supervision of contracted companies and third parties.		
		The specialist will send his/her reports directly to the Manager of the Business Unit.		
1.2	Emergency Preparedness and Response	Adapt emergency plans to each of the commercial and administrative installations, as well as the construction works, based on consideration of the site, and provide detailed preventive and emergency response actions specific to those sites. Strengthen and update the Emergency Plan with: (i) Procedures for interacting with local and regional emergency and health authorities; (ii) Protocols for firefighters, ambulances, and other emergency vehicle services, knowing the response times; (iii) Survey and assessment of nearby medical facilities classified according to seriousness of the emergency; (iv) Establish evacuation routes and meeting points plans; (v) Conduct training and periodic drills.	Copy of the strengthened and updated Emergency and Contingency Plan	Nov-30-2019

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		The plan should consider the communities in the planning of the emergency response. Each plan will assign the responsibilities of the respective brigades and managers and will include a communications system defining with whom to communicate and what to communicate depending on the case.		
1.3	Training Plan	Develop an Annual Training Plan on environmental, social, and health and safety issues for the company's own employees, contractors, and third parties. The Training Plan should include specific training for workers who are exposed to specific risks, including contractors.	Training Plan Document	Nov-30-2019
1.4	Management of Contractors	<p>Develop a documented procedure for managing contractors, to include:</p> <ul style="list-style-type: none"> (i) The basic environmental and health and safety requirements that contractors must respect; (ii) Contractors' obligations and prohibitions in environmental and health and safety matters; (iii) Employment procedures in accordance with the law and PS 2, including the basic rules prohibiting child labor, forced labor, and discrimination, and allowing freedom of association and collective bargaining; (iv) A grievance mechanism for workers; (v) Standards of conduct and behavior to be followed by outsourced personnel. <p>The procedure will establish penalties, warnings, or fines to be imposed in the case of non-compliance. According to IFC PS 1, contractors working for Los Portales will be under the direct control of the firm and will be considered as if they were company employees.</p>	Procedure for Managing Contractors	Nov-30-2019
1.5	Participation of Social Actors	<p>Prepare a documented procedure for receiving, resolving, and responding to complaints and/or claims from any member of the community, including the local authorities, establishing:</p> <ul style="list-style-type: none"> (i) A mechanism for disclosing information to interested parties in a culturally appropriate way; (ii) Interested communities' participation process providing access to consultations, claims, and concerns regarding the company's environmental, social, and safety performance, including the anonymous method; 	Procedure for receiving and resolving complaints and claims made by third parties	Nov-30-2019

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		(iii) How these consultations and claims are classified and evaluated; (iv) How responses are provided and followed up, to conclude with closing the claim; and (v) Timeframes established for response.		
1.6	Supplemental Public Participation Event	Before developing each new project, Los Portales must carry out a public participation event in accordance with the IDB Invest Sustainability Policy, which will be convened by the regional or municipal authorities, so the community can learn about the characteristics of the project, its potential impacts on the community, and the mitigation measures adopted.	Event Report	Jan-31-2020
1.7	Project's Compliance with Applicable Standards	Los Portales must submit a report with details on the implementation of the ESAP and ESMS, as well as on the status of compliance with the IDB Invest Environmental and Social Sustainability Policy, environmental, social, and safety legislation, and the IFC Performance Standards	Periodic Environmental and Social Compliance Report	Annually during the life of the loan, beginning on Mar-31-2020
PS 2: Labor and working conditions				
2.1	Human Resources Policies and Procedures	1. Develop the company's human resources policies and procedures, including, <i>inter alia</i> , promoting gender equality and non-discrimination, equal opportunity, fair treatment, agreement with appropriate labor conditions and terms of employment, adapted to the law and IFC PS 2. The policy should include explicit references to freedom of association and collective bargaining among employees.	Copy of the Human Resources Policies and Procedures	Sept-30-2019
		2. Develop a control and monitoring mechanism ensuring that contractors and subcontractors comply with the human resources policy and its procedures.		
2.1	Complaints Management Mechanism for Workers	Establish a complaints handling mechanism so that workers (and their organizations, when they exist) can formulate their concerns regarding the workplace. The company should inform workers regarding the complaints handling mechanism when they are hired and give them easy access to the	Complaints Mechanism Document and	Sept-30-2019

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		mechanism. The mechanism should contain details on how claims or complaints are recorded and evaluated, as well as the follow-up and close or resolution process, establishing responsibilities and resolution and response timeframes. It should allow anonymous complaints to be recorded and addressed. The mechanism should not bar access to other judicial and administrative remedies that may be available in accordance with existing legislation or arbitration procedures, nor should it replace the complaints handling mechanisms provided by collective agreements.	evidence of implementation.	
PS 3: Resource efficiency and pollution prevention				
3.1	Calculation of greenhouse gas emissions	Implement a procedure to present for each passed year an inventory of greenhouse gas (GHG) emissions. Implement the GHG emissions reduction plan designed for the project.	Quantification of emissions and measures for reduction	Annually during the life of the loan, beginning on Sept-30-2019
PS 4: Community health and safety				
4.1	Community Health and Safety	Develop a specific Integrated Road Safety Plan for each project, applicable to contractors and subcontractors, showing entry and exit routes for transporting machinery and construction materials, operation schedules and restrictions and including measures for mitigating possible impacts on affected communities. The procedures should consider: (i) Evaluation of alternatives for possible access routes; (ii) Identification of risks; (iii) Speed limits and speed zone restrictions, (iv) Informative posters indicating: heavy traffic and machinery, temporary roads, pedestrian routes, maximum speeds, access and exit points, and parking areas; and (v) Emergency preparedness and response. The preparation of the project's traffic management plan and its implementation should include close coordination with neighboring communities and local authorities.	Copy of the Integrated Road Safety Management Plan for the project	Sept-30-2019

PS 5: Land acquisition and involuntary resettlement				
5.1	Acquisition Plan	Develop and implement a Land Acquisition Plan to include: (i) Mapping of potentially affected individuals; (ii) Analysis of economic conditions of those affected; (iii) Inventory and valuation of assets in the area to be expropriated; (iv) Determination of the vulnerability of those affected; and (v) Appropriate compensation measures.	Procurement Plan Document	Before starting each project
PS 6: Conservation of biodiversity and sustainable management of living natural resources				
6.1	Protected or Internationally Important Species	Take a tour (prior to construction) of natural areas to be affected in order to identify the presence of individuals or nests, and take appropriate measures if protected or recognized internationally important species are found during the baseline diagnosis of the specific environmental impact study. The existence of protected species is also evaluated in the zoning change process in accordance with current regulations.	Procedure for Identifying Protected Species	Before starting each project
PS 8: Cultural Heritage				
8.1	CIRA and Chance Finds	Submit the CIRA and implement the Plan on Chance Finds of Cultural Resources.	Chance Finds Procedure	Sep-30-2019