

## 6. Environmental and Social Action Plan (ESAP)

No.	Reference	Measure	Final Product/Deliverable	Expected Completion Date
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>				
1.1	E&S Assessment and Management System (ESMS)	<p>1. Develop the final, explicit, detailed, and specific ESMS for ZZ Glass, including: (i) policy; (ii) procedures to identify, assess and manage possible E&amp;S, OHS, and occupational risks and impacts associated with each Project activity, and for workers engaged by third parties (contractors and subcontractors); (iii) internal procedures for compliance with the Environmental and Management Program (EMAP); (iv) organizational capacity and competency, including the definition of roles and allocation of responsibilities for the implementation of this ESMS; (v) emergency preparedness and response protocols; (vi) key stakeholder engagement methods or planning; (vii) external communications and grievance mechanism; (viii) protocols for the disclosure of information, decision making and training to communities; (ix) protocols for the evaluation and continuous improvement of the ESMS; and (xi) regular audits and inspections of applicable E&amp;S and OHS requirements under Law No. 64-00 of the Dominican Republic.</p>	<p>1. Copy of ZZ Glass's updated ESMS.</p>	<p>1. Eight months after the first disbursement.</p>
1.2	Environmental, Social and Occupational Health and Safety Policy	<p>1. Develop an overarching E&amp;S and OHS policy that takes into account the context and needs of ZZ Glass and/or the Project.</p> <p>2. Define the person within ZZ Glass who will ensure compliance with and be responsible for the execution of this comprehensive policy and how this policy will be communicated to all levels of the organization.</p> <p>3. Create a mechanism for ZZ Glass to measure and communicate continuous improvements in the implementation of the overarching E&amp;S and OHS policy.</p>	<p>1. Copy of ZZ's Glass or the Project's E&amp;S policy (if different).</p> <p>2. Definition of person in charge and evidence of the implementation of the communication and monitoring programs during the execution.</p> <p>3. Mechanism for measuring and communicating</p>	<p>1. Six months after the first disbursement.</p> <p>2. Six months after the first disbursement.</p> <p>3. Six months after the first disbursement.</p>

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			continuous improvements in the implementation of the E&S and OHS Policy.	
1.3	Identification of Risks and Impacts	1. Perform the identification and assessment of direct and indirect, cumulative and synergistic E&S and OHS risks and impacts for each Project stage, taking into account GHG emissions, relevant risks associated with climate change, and adaptation opportunities.	1. Copy of the identification and assessment of E&S and OHS risks and impacts for all Project stages.	1. 30 days prior to the start of construction of the Project.
1.4	Environmental Management and Adequacy Programs (EMAP)	<p>1. Develop an EMAP specific to the construction stage, with the following measures: (i) an Impact Management Program for the physical, biological, and visual environment, which will include mitigation measures for any impact on terrain relief (in the event of earthmoving or earthworks); hazardous and non-hazardous solid waste management; control of polluting gases emissions by construction machinery and equipment; disturbance of the environment due to the increased generation of dust and noise; control of liquid effluents, both industrial and domestic; (ii) an Impact Management Program for the socioeconomic environment, which will include social compensation for the communities/dwellings in the vicinity of the Project; training for construction managers and workers; measures for inter-institutional coordination; and measures to ensure safe and hygienic-sanitary conditions for workers during construction.</p> <p>2. Develop an EMAP for the O&amp;M phase that includes the following measures: (i) an Environmental Monitoring and Vigilance Program, especially for pollutant gas emissions from fixed Project sources (smelters, boilers, power generators, etc.); (ii) a Comprehensive Solid and Liquid Waste Management Program, which emphasizes environmentally friendly measures to store and dispose of any waste that cannot be reduced, reused or recycled, and</p>	<p>1. Copy of the EMAP specific to the construction stage of the Project.</p> <p>2. Copy of the EMAP specific to the Project O&amp;M.</p>	<p>1. 30 days prior to the start of construction of the Project.</p> <p>2. 30 days prior to the start of Project operations.</p>

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		<p>also provides measures for the special handling of hazardous waste, such as oils, greases, paints, solvents, medicines (should there be a health center or service), disinfectants, or any other product that requires special management used during the Project's O&amp;M activities under local environmental and health regulations; and (iii) a Workplace Health and Safety Program for the comprehensive management of actions to prevent occupational hazards.</p>		
1.5	Organizational Capacity	<ol style="list-style-type: none"> <li>1. Define the E&amp;S policy or policies and appoint within ZZ Glass's organizational structure, the person responsible for E&amp;S matters, in addition to defining the functions, responsibilities, and powers for the implementation of the ESMS and guaranteeing adequate human and financial resources as part of the ESMS.</li> <li>2. Develop and conduct an introductory and refresher training program at least once a year for all personnel responsible for the environment and OHS.</li> <li>3. Appoint and certify/register the Joint Committee for Occupational Health and Safety of ZZ Glass, as provided for in the Occupational Health and Safety.</li> </ol>	<ol style="list-style-type: none"> <li>1. Appointment of the person responsible for E&amp;S at ZZ Glass, together with the definition of roles, responsibilities, and powers.</li> <li>2. Copy of the training and refresher program, as well as evidence of its implementation.</li> <li>3. Certification/registration of the ZZ Glass Joint Committee for Occupational Health and Safety.</li> </ol>	<ol style="list-style-type: none"> <li>1. 90 days after signing the loan agreement.</li> <li>2. 90 days after signing the loan agreement.</li> <li>3. 30 days prior to the start of Project operations.</li> </ol>
1.6	Emergency Preparedness and Response	<ol style="list-style-type: none"> <li>1. Develop an Emergency Response Plan (ERP) for each stage and specific to the Project, with a set of specific pre-defined procedures for coordination, alert, mobilization and response in the event or imminence of a particular event, such as: (i) natural hazards such as earthquakes, hurricanes and/or tropical storms, floods, thunderstorms, etc.; (ii) human conflicts (e.g., civil and war disruptions); and (iii) technological hazards from fires, explosions, fuel spills, and accidents befalling workers and suppliers. The</li> </ol>	<ol style="list-style-type: none"> <li>1. Copy of the Emergency Response Plan, in stages and specific to the Project.</li> </ol>	<ol style="list-style-type: none"> <li>1. 90 days after signing the loan agreement.</li> </ol>

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		<p>ERP will address the following aspects: (i) specific emergency response procedures; (ii) trained emergency response teams; (iii) emergency contacts and communication systems/protocols; (iv) procedures for interaction with local and regional emergency and health authorities; (v) permanent emergency equipment and facilities (e.g., first aid stations, extinguishers/hoses, sprinkler systems); (vi) protocols for fire trucks, ambulances and other emergency vehicle services; (vii) evacuation routes and meeting points; (viii) training exercises such as annual drills, or more frequently if necessary, or actual events in which ZZ Glass will include nearby properties and other key stakeholders to familiarize them with proper procedures in the event of an emergency.</p> <p>2. Develop, for the ERP, a Training Plan and a Root Cause Analysis procedure for each major accident or fatality, as well as a description of the corrective actions required to minimize the risk of reoccurrence.</p>	<p>2. Copy of the Training Plan and Root Cause Analysis procedure for the ERP.</p>	<p>2. 90 days after signing the loan agreement.</p>
1.7	Monitoring and Review Indicators	<p>1. Develop a compliance matrix with a set of KPIs that will be monitored and met in order to measure the effectiveness of the EMAP and the fulfillment of all Project legal and contractual obligations during the construction and O&amp;M phases. This compliance matrix will include: (i) the competent Authority granting the authorization or issuing the permit; (ii) issue and effective dates; (iii) the person within ZZ Glass who is responsible for follow-up/compliance; and (iv) communication and future compliance procedures.</p>	<p>1. Compliance matrix for the Project with a list of management and success KPIs during the construction and O&amp;M phases.</p>	<p>1. 60 days after signing the loan agreement.</p>
1.8	Project Compliance with Applicable Standards	<p>1. Prepare, through an internal or external audit (endorsed by the National Environmental Authority), a consolidated annual report on the compliance status of all environmental, social, and OHS policies and measures applicable to the Project works, including the progress of</p>	<p>1. Regular environmental and social compliance report for ZZ Glass.</p>	<p>1. Annually over the life of the loan.</p>

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		ESMS actions with regard to the defined KPIs, as well as its compliance status with the IDB Invest E&S Sustainability Policy, the Dominican Republic's laws on E&S and OHS, and the IFC Performance Standards.		
1.9	Stakeholder Engagement	<p>1. Implement a Stakeholder Engagement Management Procedure, to include the following: (i) updated identification of all stakeholders, including the local authorities and surrounding communities and neighbors (within a 500 m radius of the Project); (ii) differentiated measures to enable the effective engagement of disadvantaged or vulnerable groups; (iii) a mechanism to ensure that community representatives accurately represent the views of the affected communities; (iv) details on how information is disclosed to stakeholders; (v) details on the stakeholder engagement process in these communities and how they can access the grievance mechanism; (vi) regular reporting on the company's E&amp;S performance to stakeholders and the public at large; and (vii) mechanisms for implementing and disclosing the updated procedure to all its staff as part of a Training Program.</p>	<p>1. Copy of Project Stakeholder Engagement Management Plan.</p>	<p>1. 90 days after signing the loan agreement.</p>
		<p>2. Develop a Community Relations Procedure that sets out effective strategies for communicating and maintaining good relations with the population in the area of influence of the Project and with stakeholders. This procedure will identify the work team responsible for its implementation (e.g., the Social Management manager and a team of social promoters) and define the protocols for the following activities: (i) interviews with authorities and stakeholder representatives; (ii) stakeholder briefings; (iii) media and social networks management; and (iv) guided tours of the glass bottle production facility.</p>	<p>2. Copy of the Project Community Engagement Procedure.</p>	<p>2. 90 days after signing the loan agreement.</p>

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1.10	Public Hearing	1. Conduct a public hearing in the area of influence of the Project, whose announcement and consultation process will fulfill the requirements of PS-1, namely: (i) to obtain the views of both men and women, if necessary through separate engagement or fora, and (ii) to reflect the different concerns and priorities of men and women about the Project's impacts, mitigation mechanisms, and benefits, where appropriate; (iii) to document the process, especially the measures taken to avoid or minimize risks and adverse impacts on affected and/or stakeholder communities; and (iv) to inform those affected of how their concerns have been addressed.	1. Report on the results of the Project's Public Hearing.	1. During the EIA Evaluation Process, as provided for in the E&S legislation.
1.11	External grievance mechanism for the construction phase	2. Develop and implement an external grievance mechanism focused on the key stakeholders and the communities and/or neighbors that are affected or with any stake in the indirect area of influence of the Project sites, for the pre-construction/refurbishment and construction phases of the Project. This external grievance mechanism will include details on how grievances or complaints are recorded, investigated and evaluated, and their follow-up and closure or resolution process.	1. Copies of the external grievance mechanism for the pre-construction/refurbishment and phase of the Project.	1. 90 days after signing the loan agreement.
			2. Copies of proof of its implementation.	2. With each E&S compliance report (see No. 1.8).
1.12	External grievance mechanism during operation and maintenance (O&M)	1. Provide and implement an external grievance mechanism during the Project O&M that incorporates the experiences and lessons learned during the construction phase.	1. Copies of the external grievance mechanism for the Project O&M.	1. 30 days prior to the start of Project operations.
			2. Copies of proof of its implementation.	2. With each E&S compliance report (see No. 1.8).
<b>PS 2: Labor and Working Conditions</b>				
2.1	Human Resources	1. Develop a Human Resource Policy and its procedures, in keeping with the Labor Code of the Dominican Republic that includes, among others, the promotion of gender	1. Copy of the ZZ Glass Human Resources Policy.	1. Six months after signing the loan agreement.

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	Policies and Procedures	<p>equality and non-discrimination, equal opportunity, fair treatment, a contract with suitable working conditions and terms of employment, notice of dismissal and severance pay for employees.</p> <p>2. Define a mechanism to ensure that contractors and their subcontractors also comply with the ZZ Glass's Human Resources Policy and its procedures.</p>	<p>2. Copy of the mechanism that ensures that contractors and subcontractors comply with the Human Resources Policy.</p>	<p>2. Six months after signing the loan agreement.</p>
2.2	Code of conduct	<p>1. Develop and implement a Code of Conduct (or Code of Ethics) for ZZ Glass, intended to define coexistence measures between collaborators and for any person entering the factory, the rules of conduct, both inside and outside the facilities, and the sanctions in the event of non-compliance.</p>	<p>1. Copy of the Code of Conduct for ZZ Glass employees.</p>	<p>1. Six months after signing the loan agreement.</p>
2.3	Working Conditions and Terms of Employment	<p>1. Develop and implement an Internal Labor Regulation (ILR) that contains the following: (i) an employment procedure for own workers and those engaged by third parties, in which the conditions for employment and dismissal comply with local and International Labor Organization (ILO) regulations, including, but not limited to, regulations to prevent child labor and forced labor; (ii) procedures for employment and dismissal/retraining of own employees and the procedures adopted by contractors for their workers; and (iii) procedures for managing and monitoring the performance of own employees and those engaged by third parties.</p> <p>2. Create an ILR Training and Disclosure Program for its implementation and disclosure to all ZZ Glass employees and to workers engaged by third parties (contractors and subcontractors).</p>	<p>1. Copy of ZZ Glass's Internal Labor Regulations.</p> <p>2. Copy of the ZZ Glass ILR Training and Disclosure Program.</p>	<p>1. 90 days after signing the loan agreement.</p> <p>2. 90 days after signing the loan agreement.</p>

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2.4	Internal Grievance Mechanism for the construction phase	1. Develop and implement an internal grievance mechanism focused on direct employees and those of contractors and subcontractors, for the pre-construction/refurbishment and construction phase of the Project. This internal grievance mechanism will include details on how complaints or grievances are recorded, investigated and evaluated, and their follow-up and closure or resolution process.	1. Copies of the internal grievance mechanism for the construction phase of the Project.	1. 90 days after signing the loan agreement.
			2. Copies of proof of its implementation.	2. With each E&S compliance report (see No. 1.8).
2.5	Internal Grievance Mechanism for the O&M	1. Provide and implement an internal grievance mechanism during the Project O&M that incorporates the experiences and lessons of the construction phase.	1. Copies of the internal grievance mechanism for the O&M of the Project.	1. 30 days prior to the start of Project operations.
			2. Copies of proof of its implementation.	2. With each E&S compliance report (see No. 1.8).
2.6	Occupational Health and Safety	1. Develop and implement an Occupational Health and Safety Program (OHSP) that includes: (i) the identification of possible OHS risks for workers according to the work they perform; (ii) risk assessment, risk map and intervention plan; (iii) details of the preventive and protective measures implemented, worker training and daily safety briefings during the site visit; (iv) imparting specific training for workers and emergency brigades; (v) performing medical examinations and collecting statistics on accidents and occupational diseases; and (vi) a copy of the reports prepared in the event of workplace accidents or incidents.	1. Copy of the ZZ Glass Occupational Safety and Health Program.	1. 90 days after signing the loan agreement.
			2. Copies of proof of its implementation.	2. With each E&S compliance report.
2.7	Notification Mechanism on Fatalities and Root Cause Analysis	1. As part of the OHSP, develop a procedure and mechanism for notifying emergency response agencies, the local authorities, and the Bank of fatalities or major accidents; as well as an accident Root Cause Analysis procedure to ensure the implementation of corrective actions to prevent future accidents.	1. Copy of the notification mechanism and Root Cause Analysis procedure.	1. 90 days after signing the loan agreement.

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2.8	Workers Engaged by Third Parties	<p>2. Develop a Policy on the Hiring and Provision of Services of Workers Engaged by Third Parties that complies with the Labor Code and the international conventions of the ILO and that allows it to: i) ensure that its contractors which employ these workers are legitimate companies of proven integrity that have implemented an appropriate E&amp;S Management System that allows them to operate in a manner consistent with the provisions of PS-2; ii) set forth policies and procedures to manage and review the performance of such third-party employers through commercially viable means incorporated into the text of the contractual agreements; and finally, iii) ensure that workers engaged by third parties have access to the grievance mechanism, either that of the Contractor or that of the Promoter itself.</p> <p>3. Create a Training Program on the Employment Policy for the Employment and Provision of Services of Workers Engaged by Third Parties for its implementation and disclosure to all ZZ Glass personnel who contract outsourced services.</p>	<p>2. Copy of ZZ Glass's Policy for the Employment and Provision of Services of Workers Engaged by Third Parties.</p> <p>3. Copy of ZZ Glass's Training Program on the Policy for the Employment and Provision of Services of Workers Engaged by Third Parties.</p>	<p>2. 60 days after signing the loan agreement.</p> <p>3. 60 days after signing the loan agreement.</p>
2.9	Supply Chain	<p>1. Create a Program for the Regulation of its Main Supply Chain to: (i) control and prevent the risk or occurrence of child labor or forced labor, in observance of legislation and international conventions to which the Dominican Republic is a signatory; and (ii) ensure that the principal suppliers in the supply chain take measures to prevent or correct situations that endanger the lives of workers owing to the unsafe extraction, handling, storage, and transportation of hazardous products.</p>	<p>1. Copy of ZZ Glass's Program for the Regulation of its Main Supply Chain.</p>	<p>1. Six months after signing the loan agreement.</p>
<b>PS 3: Resource Efficiency and Pollution Prevention</b>				
3.1	Greenhouse Gases (GHG)	<p>1. Develop a Greenhouse Gas Emissions Prevention Program for the O&amp;M phase of the Project, which will define and</p>	<p>1. Copy of the Greenhouse Gas</p>	<p>1. 30 days prior to the start of</p>

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		require the implementation of a specific procedure to estimate the GHG emissions of its own facilities or those under its control inside the physical boundaries of the Project, in addition to the indirect emissions resulting from energy production and the transport of materials off site.	Emission Prevention Program for the O&M phase of the Project.	Project operations.
			2. Copies of proof of its implementation.	2. With each E&S compliance report (see No. 1.8).
3.2	Water Consumption	1. Develop a Water Consumption Awareness and Reduction Program for the Project's O&M phase in order to comprehensively implement the following water saving measures: i) monthly monitoring of water consumption; and ii) an operating procedure triggered by any variation/alteration in consumption that verifies and corrects the cause either by plugging leaks or replacing fittings.	1. Copy of the ZZ Glass Water Consumption Awareness and Reduction Program	1. 30 days prior to the start of Project operations.
			2. Copies of proof of its implementation.	2. With each E&S compliance report (see No. 1.8).
3.3	Energy Efficiency	1. Develop and implement an Energy Efficiency Program that will: (i) identify measures to reduce to a minimum the use of fuels and electricity; (ii) identify measures to optimize the use of heat and/or cogeneration; (iii) analyze alternatives to utilize renewable and/or alternative energy sources; (iv) minimize the carbon footprint of the Project's operations; and (v) analyze and implement the following comprehensive energy saving measures: replacing low-efficiency air conditioning systems with high-efficiency equipment and ozone-friendly refrigerants (e.g., replacing the use of R22 as a refrigerant), installing LED lights in operating, storage, and parking areas, automating processes through programmable logistics controls, applying inverter technology to maximize efficiency in the equipment with the highest demand, such as industrial cooling and air conditioning systems, and using insulating and thermo-acoustic materials to reduce heat transfer and eliminate noise.	1. Copy of the ZZ Glass Energy Efficiency Program.	1. 30 days prior to the start of Project operations.
			2. Copies of proof of its implementation.	2. With each E&S compliance report (see No. 1.8).

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3.4	Effluent Pollution Prevention	1. Develop an Effluent Management Program that includes the evaluation, control, and monitoring of the wastewater treatment system (grease trap, sand traps, etc.), before discharging its water into the municipal sewer system, in accordance with the provisions of the Environmental Standard on the Control of Discharges to Surface Waters, Sanitary Sewerage, and Coastal Waters.	1. Copy of the ZZ Glass Effluent Management Program.	1. 30 days prior to the start of Project operations.
			2. Copies of proof of its implementation.	2. With each E&S compliance report (see No. 1.8).
3.5	Solid Waste Pollution Prevention	1. Establish a Solid Waste Management Program to classify solid waste into three components: 1) losses, which correspond to damaged and discarded products; 2) donations, which are those products that are not suitable for sale, but are for consumption, and that are delivered free of charge to different foundations; and 3) recyclables, i.e. cardboard, paper, plastics, wood, metals, and organic waste, which are removed by a duly authorized/registered company under a service contract.	1. Copy of the ZZ Glass Solid Waste Management Program	1. 30 days prior to the start of Project operations.
			2. Copies of proof of its implementation.	2. With each E&S compliance report (see No. 1.8).
3.6	Solid Waste Pollution Prevention	1. Prepare an Air Quality, Noise and Vibration Monitoring Program, which includes measuring/monitoring prior to the construction phase in order to establish the Baseline and then during the construction and O&M phases, which will repeat such measuring/monitoring every semester (or with the frequency proposed by the National Environmental Authority), for both environmental conditions and workplace conditions and worker exposure.	1. Copy of the ZZ Glass Air Quality, Noise, and Vibration Monitoring Program.	1. 30 days prior to the start of Project operations.
			2. Copies of proof of its implementation.	2. With each E&S compliance report (see No. 1.8).
3.7	Hazardous Materials Handling Pollution Prevention	1. Create a Program for the Prevention of Impacts from Hazardous Waste Handling that contains key actions and/or mechanisms for the correct handling of hazardous materials such as fuels, oils, grease and paints, gypsum, limestone, soda ash, among others. This Program will include criteria for locating the places where such hazardous materials will be handled and stored, and the procedures for their adequate storage, maximum permitted	1. Copy of the ZZ Glass Impact Prevention Program for Hazardous Materials Management.	1. 30 days prior to the start of Project operations.
			2. Copies of proof of its implementation.	2. With each E&S compliance report (see No. 1.8).

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		<p>volumes, permits, safety signs, use of appropriate PPE, among other safety measures, as indicated in the Safety Data Sheets for each product. This Program will also provide that the storage place(s) of these hazardous materials will be insulated, water resistant, covered, contain a containment dam, have restricted access, be well ventilated and illuminated, etc., as set forth in the national OHS regulation.</p>		
<b>PS 4: Community Health, Safety and Security</b>				
4.1	Fire protection systems	<ol style="list-style-type: none"> <li>1. Provide certification from a qualified professional acceptable to IDB Invest, who will verify that the design of the Project's fire protection facilities satisfies the L&amp;FS requirements of the IFC General Environmental, Health, and Safety Guidelines and that said design is fully compliant with the international L&amp;FS code and the laws of the Dominican Republic.</li> <li>2. Provide certification by a qualified professional acceptable to IDB Invest that verifies that the Project buildings and facilities were built as per the previously approved L&amp;FS design and that all L&amp;FS devices were installed as designed and tested as required by international requirements.</li> </ol>	<ol style="list-style-type: none"> <li>1. Copy of the certification of the design of the Project fire protection facilities.</li> <li>2. Copy of the certification of construction of the Project fire protection facilities.</li> </ol>	<ol style="list-style-type: none"> <li>1. 30 days prior to the start of Project operations.</li> <li>2. 30 days prior to the start of Project operations.</li> </ol>
4.2	Road Safety	<ol style="list-style-type: none"> <li>3. Develop a Road Safety Management Plan specific to the Project site that includes vehicular composition as part of the analysis and lists mitigation measures of possible impacts on the affected communities, especially during all phases of the Project (pre-construction/refurbishing, construction, and O&amp;M).</li> </ol>	<ol style="list-style-type: none"> <li>3. Copy of the Project Road Safety Management Plan.</li> </ol>	<ol style="list-style-type: none"> <li>3. 30 days prior to the start of construction of the Project.</li> </ol>
4.3	External Security Policy and Protocols	<ol style="list-style-type: none"> <li>1. Provide a copy of the contract entered into by ZZ Glass and the security company or companies, in order to verify, among other aspects, that it includes clauses that allow it to (i) conduct reasonable investigations to ensure that security personnel do not have a criminal record and have not been involved in cases of abuse; (ii) verify details of</li> </ol>	<ol style="list-style-type: none"> <li>1. Copy of the contracts entered into by ZZ Glass and the security company(ies).</li> </ol>	<ol style="list-style-type: none"> <li>1. 60 days after signing the loan agreement.</li> </ol>

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		necessary training on the use of force; (iii) verify restrictions on the use of firearms; and (iv) identify details of environmental awareness training.		
<b>PS 8: Cultural Heritage</b>				
8.1	Cultural Heritage	1. Prepare a Chance Find Procedure for the execution of any additional works associated with the Project that require earthmoving and/or earthworks, in accordance with the provisions of PS8.	1. Copy of ZZ Glass's Chance Find Procedure.	1. 30 days prior to the start of execution of any additional works associated with the Project that require earthmoving and/or earthworks.