

Annex 1: Environmental and Social Action Plan (ESAP)

No.	Reference	Measure	Final product/deliverable	Expected completion date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Environmental and Social Management System (ESMS)	1. Develop a project-specific ESMS compliant with the IFC Implementation Manual and Toolkit	1. Copy of Atlas's updated project-specific ESMS	1. Before first disbursement.
1.2	Environmental, Social and Occupational Health, Safety and Security Policy	1. Update the project-specific Environmental, Social, and Health and Safety (ESHS) Policy considering the context and needs of Atlas and the Project, and establishing who, within the organization, will guarantee its compliance and be responsible for its execution.	1. Copy of the updated Atlas's or the Project's ESHS Policy.	1. Before the first disbursement.
		2. Create and adopt a program to monitor and communicate the updated ESHS policy to all members and levels of the organization.	2. Copy of the monitoring and communications programs to all members and levels of the organization	2. 60 days after the first disbursement.
			3. Evidence of this implementation	3. Together with each Annual ESHS Consolidated Report
		4. Create and adopt a program to measure ongoing improvements on the updated ESHS policy implementation.	4. Copy of the continuous improvement program.	4. 60 days after the first disbursement.
			5. Evidence of this implementation	5. Together with each Annual ESHS Consolidated Report
1.3	Risk and Impact Identification	1. Update and implement Atlas procedure for identifying the ESHS risks and impacts of the Project, and ensure that the full scope of risks of the Project are identified comprehensively; including the impacts on water quality and quantity based on the activities of maintenance of the	1. Updated E&S risks and impacts procedure	1. 7 days prior to the start of construction, or 90 days after signing the Loan

		solar panels, as well as water requirements during construction.		Agreement, whichever comes first.
		2. Update the Flood Risk Analysis using hydrological studies as a reference, including return periods with a conservative range (100 years) and considering the hydrological balance of the Laguna de Término hydrological system near the Project	2. Updated Flood Risk Analysis.	2. 7 days prior to the start of construction, or 90 days after signing the Loan Agreement, whichever comes first.
		3. Present a comprehensive alternative analysis report for the selection of the Project site.	3. Copy of the comprehensive alternative analysis	3. 60 days after the first disbursement.
1.4	Management Programs	1. Develop a project-specific Environmental and Social Management Plan (ESMP) for the Construction phase, taking into account provisions contained in the Corporate EMP, the approved MIA-R and EVIS E&S programs, and World Bank EHS Guidelines for reference, that will also include: i) water quality management and conservation actions; ii) an air quality monitoring and noise control program; iii) vehicles and machinery maintenance programs; and iv) a closure and decommissioning program.	1. Copy of the project-specific Environmental and Social Management Plan (ESMP) for the Construction phase.	1. 7 days prior to the start of construction, or 90 days after signing the Loan Agreement, whichever comes first.
		2. Develop a project-specific Environmental and Social Management Plan (ESMP) for the Operation and Maintenance (O&M) phase, considering the experience and lessons learned during the implementation of the ESMP for the construction phase	2. Copy of the project-specific ESMP for the O&M phase.	2. 15 days prior to operation
1.5	Organizational Capacity	1. Appoint the necessary staff for the project-specific Environmental and Social Unit, that will be responsible for planning, implementing and monitoring all E&S actions required by the GLEBEP; defining the functions, responsibilities and faculties of each E&S manager of said Environmental and Social Unit, for the implementation of the ESMS.	1. Appointment of the entire project-specific Environmental and Social Unit	1. 7 days prior to the start of construction.
		2. Design an introductory and refresher training program to update concepts at least once a year, for all personnel in charge of ESHS and labor matters compliance.	2. Copy of the introductory and	2. 60 days after signing the loan agreement.

			refreshing training program	
		3. Appoint and maintain as many qualified Environmental and Social Coordinator or Supervisor (or similar position depending on the responsibilities) for each work front, who must directly and independently inform Atlas's General Management about ESHS compliance.	3. Appointment of the E&S Coordinator/ Supervisor assigned to each work front.	3. 7 days prior to the start of construction.
1.6	Emergency Preparedness and Response Plan (“EPRP”)	1. Prepare a project-specific EHS Risk Assessment and EPRP for the Construction phase, based on the Corporate Procedures, including or enhancing the following aspects: i) organizational structure; ii) activation plan; iii) response procedures; iv) training and drills; v) description of potential emergencies; vi) reporting and communication during the emergency; vii) responsibilities; viii) incident investigation and follow-up procedures; ix) contact information for emergency and support services; x) map of the workplace showing evacuation routes and meeting locations; xi) location of emergency equipment; xii) first aid station; xiii) rescue plan evaluation; and xiv) periodic revision of the plan.	1. Copy of the project-specific EHS Risk Assessment and EPRP, for the construction phase	1. 7 days prior to the start of construction, or 90 days after signing the Loan Agreement
		2. Compile a similar project-specific EPRP for the O&M phase, considering the experience and lessons learned during the implementation of the EPRP for the construction phase	2. Copy of the project-specific EPRP for the O&M phase	2. 15 days prior to operation
1.7	Monitoring and evaluation indicators	1. Develop a project-specific Environmental Monitoring Plan (PVA, for its acronym in Spanish) for the Construction phase, ensuring that the procedures for monitoring and measuring the effectiveness of the management programs are in place, that should monitor (i) the key risks and impacts of the Project on employees, stakeholders and the natural environment as identified in the MIA-R general PVA; (ii) a project-specific ESHS Compliance Matrix; and (iii) progress in implementation of the ESMP	1. Copy of the project-specific PVA for the Construction phase	1. 7 days prior to the start of construction, or 90 days after signing the Loan Agreement, whichever comes first.
		2. Develop a similar project-specific PVA for the O&M phase, considering the experience and lessons learned	2. Copy of the project-specific	2. 15 days prior to operation

		during the implementation of the PVA for the Construction phase	PVA for the O&M phase	
		3. Develop a project-specific ESHS Compliance Matrix with a set of key performance indicators that should be monitored and met in order to measure the effectiveness of the ESMP and all the legal and contractual obligations of the Project during its construction and O&M phases.	3. Copy of the project-specific ESHS Compliance Matrix	3. prior to the start of construction, or 90 days after signing the Loan Agreement
		4. Develop a project-specific Contractor Management Plan, or a Contractor Supervision Procedure, which includes: (i) how and when the contractor's E&S performance will be reviewed; (ii) the mechanisms that will be used to supervise work in the field, and measure the contractor performance; and (iii) the KPI against by which contractors will be measured	4. Copy of the project-specific Contractor Management Plan, or a Contractor Supervision Procedure	4. 7 days prior to the start of construction, or 90 days after signing the Loan Agreement, whichever comes first.
1.8	Project Compliance with applicable regulations	1. Prepare internally (internal audit) or through an external independent environmental and social expert endorsed by the National Environmental Authority (external audit), an Annual ESHS Consolidated Report on the compliance status with all environmental, social, and OHS policies and measures applicable to the Project's works, including the progress of the ESMS actions regarding the established key performance indicators, as well as the compliance status of IDB Invest's Environmental and Social Sustainability Policy, of Mexico's environmental, social and OHS legislation, and of the IFC's Performance Standards.	1. Copy of the Annual ESHS Consolidated Report.	1. Annually over the life of the loan.
1.9	Stakeholders Engagement Plan ("SEP")	1. Provide an appropriate project-specific SEP, ranging from federal and state government and relevant institutions, to suppliers and local communities including vulnerable groups.	1. Copy of the project-specific SEP.	1. 7 days prior to the start of construction, or 60 days after signing the Loan Agreement, whichever comes first.
		2. Provide documented evidence of public consultation and information disclosure to be undertaken through the project-specific SEP.	2. Evidence of public consultation and	2. Together with each Annual ESHS Consolidated Report

			information disclosure	
1.10	External Grievance Mechanism	1. Improve the project-specific Community Grievance Mechanism, by including periodic reporting based on the project-specific Communication Plan (included in the SEP) and reinforcing its implementation by installing mailboxes in multiple strategic points to facilitate their access and guarantee the possibility of anonymous use.	1. Copies of the improved project-specific Community Grievance Mechanism.	1. 7 days prior to the start of construction, or 60 days after signing the Loan Agreement, whichever comes first.
			2. Evidence of this implementation.	2. Together with each Annual ESHS Consolidated Report
		3. Launch a general outreach and training campaign among the affected communities within the PAI to promote the use this project-specific Community Grievance Mechanism and ensure its operationalization	3. Copy of the general outreach and training campaign	3. Together with each Annual ESHS Consolidated Report
PS 2: Labor and Working conditions				
2.1	Management of Workers Relationships	1. Revise the EPC Contractor's labor and working conditions to ensure they meets Atlas's requirements and are aligned with PS2.	1. Revision report of EPC Contractor's labor and working conditions	1. 15 days prior to signing the EPC Contract.
		2. Elaborate quarterly monitoring reports to verify proper implementation of all labor and other requirements during the construction phase.	2. Copy of the monitoring report	2. Every quarter starting from the beginning of construction
2.2	Local Hiring	1. Elaborate a project-specific Recruitment Plan in accordance with local regulations and those of the International Labor Organization ("ILO"), that sets a minimum local hiring target, accurate breakdowns of skilled/unskilled workers, an assessment of the local labor pool, opportunities for incorporating women and vulnerable groups, and that clearly describes relevant information to manage expectations from local communities such as available positions, types of jobs, required qualifications and skills, and job duration and retrenchment.	1. Copy of the project-specific Recruitment Plan	1. 7 days prior to the start of construction, or 60 days after signing the Loan Agreement, whichever comes first.

2.3	Internal Grievance Mechanism	1. Improve and adopt the project-specific Employees Grievance Mechanism for Project’s workers, to ensure: (i) is available for all workers, employed either directly or by third parties and should receive regular reporting on the grievances raised by workers; (ii) is disclosed at the time of recruitment and made easily accessible to the workers at any time and at no cost to the complainant; (iii) allow for anonymous complaints; and (iv) does not impede access to other judicial or administrative remedies that might be available under the law, or to existing arbitration procedures.	1. Copies of the improved project-specific Employees Grievance Mechanism.	1. 7 days prior to the start of construction, or 60 days after signing the Loan Agreement, whichever comes first.
		2. Launch a general outreach and training campaign among the working population to promote this employee grievance mechanism and ensure its operationalization	2. Evidence of this implementation.	2. Together with each Annual ESHS Consolidated Report
		3. Launch a general outreach and training campaign among the working population to promote this employee grievance mechanism and ensure its operationalization	3. Copy of the general outreach and training campaign	3. Together with each Annual ESHS Consolidated Report
2.4	Occupational Health and Safety (“OHS”)	1. Develop a project-specific OHS Plan for the construction phase, identifying and evaluating risks and potential hazards in accordance to job functions, as well as identifying preventive to eliminate or control them.	1. Copy of the project-specific OHS Plan, for the construction phase.	1. 7 days prior to the start of construction, or 60 days after signing the Loan Agreement, whichever comes first.
		2. Develop a similar project-specific OHS Plan for the O&M phase, considering the experience and lessons learned during the implementation of the OHS Plan for the Construction phase	2. Copy of the project-specific OHS Plan for the O&M phase	2. 30 days prior to the O&M phase
2.5	Accidents and fatalities	1. Develop a Notification Procedure to report major accidents, including fatalities.	1. Copy of the notification procedure for major accidents.	1. 7 days prior to the start of construction, or 60 days after signing the Loan Agreement
		2. Prepare a root cause analysis for each major accident or fatality and ensure the implementation of corrective actions.	2. Copy of the root cause analysis and its corrective actions.	2. Together with each Annual ESHS Consolidated Report
PS 3: Resource Efficiency and Pollution Prevention				

3.1	Greenhouse Gases	1. Develop and implement a project-specific GHG protocol to estimate GHG emissions inventory by the Project and define strategies for reducing emissions during the Project lifecycle.	1. Copy of the project-specific GHG protocol	1. 90 days after signing the Loan Agreement
			2. Evidence of this implementation.	2. Together with each Annual ESHS Consolidated Report
3.2	Water Consumption	1. Elaborate and implement a project-specific Water Management Strategy for the Project’s lifecycle that aims at the efficient consumption of water resource and is complemented by an analysis of the demand, the frequency, types of use, the efficient use, has records of water consumption and monitoring measures, and includes a comparative analysis with the water demand of other solar projects in the country and in the region and evaluate the water consumption by the communities in the area of influence.	1. Copy of the project-specific Water Management Strategy	1. 7 days prior to the start of construction, or 90 days after signing the Loan Agreement
			2. Evidence of this implementation.	2. Together with each Annual ESHS Consolidated Report
3.3	Waste Management Plan (“WMP”)	1. Develop and implement a project-specific Waste Management Plan (“WMP”) that ensures an integrated waste management during the Project lifecycle for both hazardous and non-hazardous waste, that sets instructions and requirements for a proper segregation, storage and disposal of waste generated during the execution of works, and is compliant with applicable in-country environmental laws and IDB Invest’s Sustainability Policy.	1. Copy of the project-specific WMP.	1. 7 days prior to the start of construction, or 90 days after signing the Loan Agreement
			2. Evidence of this implementation.	2. Together with each Annual ESHS Consolidated Report
		3. Develop and adopt a project-specific Solar Panel Final Disposal Plan, which promotes the recycling of solar panels at the end of the Project’s lifecycle and contains proposed strategies for the final disposal or include a factory buy back or recycling program and details for specific permits following local and international regulations	3. Copy of the project-specific Solar Panel Final Disposal Plan	3. 90 days after signing the Loan Agreement, whichever comes first.
			4. Evidence of this implementation.	4. Together with each Annual ESHS Consolidated Report
3.4	Hazardous Material Management	1. Develop and implement within the project-specific WMP Plan a Hazardous Material Substitution Program to explore opportunities throughout the project lifecycle to use non-hazardous materials instead of hazardous materials.	1. Copy of the Hazardous Material Substitution Program	1. 7 days prior to the start of construction, or 90 days after signing the Loan Agreement, whichever comes first.

			2. Evidence of this implementation.	2. Together with each Annual ESHS Consolidated Report
3.5	Pest and Vector Management Program	1. Develop and implement an Integrated Pest and Vector Management Program, targeting economically significant pest infestations and disease vectors of public health significance, compliant with PS3.	1. Copy of the Integrated Pest and Vector Management Program	1. 7 days prior to the start of construction, or 90 days after signing the Loan Agreement, whichever comes first.
			2. Evidence of this implementation.	2. Together with each Annual ESHS Consolidated Report
PS 4: Community Health and Safety				
4.1	Community Health and Safety Plan	1. Develop and Implement a project-specific Community Health and Safety Plan, that conducts a comprehensive site-specific identification and assessment process of all possible risks and impacts on community health and safety during the Project lifecycle and establishes preventive and control measures.	1. Copy of the project-specific Community Health, and Safety Plan	1. 7 days prior to the start of construction, or 90 days after signing the Loan Agreement
			2. Evidence of this implementation.	2. Together with each Annual ESHS Consolidated Report
4.2	Traffic Management	1. Develop and implement a project-specific Traffic Management Plan, which identifies potential risks associated with traffic increase and includes relevant management measures (access roads, signaling, speed limits, etc.).	1. Copy of the project-specific Traffic Management Plan	1. 7 days prior to the start of construction, or 90 days after signing the Loan Agreement, whichever comes first.
			2. Evidence of this implementation.	2. Together with each Annual ESHS Consolidated Report
4.3	Security Management	1. Prepare and implement a project-specific Security Forces Management Plan using as a reference the IFC's <i>Good Practice Handbook Use of Security Forces: Assessing and Managing Risks and Impacts</i> .	1. Copy of the project-specific Security Force Management Plan	1. 7 days prior to the start of construction, or 90 days after signing the Loan Agreement, whichever comes first.

			2. Evidence of this implementation.	2. Together with each Annual ESHS Consolidated Report
4.4	External safety protocols and policy	1. Include in contracts to be subscribed by Atlas and the security companies provisions that will allow Atlas to perform: (i) reasonable investigations to ensure that security personnel do not have a criminal record and have not been involved in past cases of abuse; (ii) verify details of necessary training in relation to the use of force; (iii) verify restrictions on the use of firearms; and (iv) identify details of environmental and social awareness training, including issues of respect for human rights.	1. Copy of the contracts between Atlas and the security company(s).	1. 45 days after signing the Loan Agreement.
PS 5: Land Acquisition and Involuntary Resettlement				
5.1	Land Acquisition	1. Submit the signed and formalized purchase contract for the additional land for the construction of the electrical substation.	1. Copy of the signed and formalized purchase contract	1. Prior to first disbursement
PS 6: Biodiversity Conservation and Natural Habitats				
6.1	Protection and Conservation of Biodiversity	1. Develop an updated Biodiversity Baseline Survey that includes sampling during the dry season, increase the number and location of sampling stations and follows the guideline set forth in the Good Practices for the Collection of Biodiversity Baseline Date Guideline.	1. Copy of the updated Biodiversity Baseline Survey	1. 7 days prior to the start of construction, or 90 days after signing the Loan Agreement, whichever comes first.
		2. Develop an alternative analysis for the final layout setting of all Project's facilities, performing micro-routing and micro-siting surveys to minimize the impacts on local biodiversity.	2. Copy of the alternative analysis for the final layout setting of the Project's facilities	2. 7 days prior to the start of construction, or 90 days after signing the Loan Agreement, whichever comes first.
		3. Prepare a Flora Control Procedure for the O&M phase, including the planned activities to control the growth of the	3. Copy of the Flora Control Procedure	3. 15 days prior to operation

		vegetation in the solar panel area, avoiding the use of agrochemicals, or justifying its use as a last resort.	4. Evidence of this implementation.	4. Together with each Annual ESHS Consolidated Report
6.2	Fauna Impact	1. Develop and implement a Bird Mortality Monitoring Plan to analyze bird fatalities due to the possible “lake effect” or to collisions with the power line, following the guidelines set forth in the “Mortality Monitoring Design for Utility-Scale Solar Power Facilities”, and the IFC EHS Guidelines for Electric Power Transmission and Distribution, or similar standard	1. Copy of the Bird Mortality Monitoring Plan	1. 15 days prior to operation
			2. Evidence of this implementation.	2. Together with each Annual ESHS Consolidated Report
6.3	Critical Habitat Assessment	1. Develop a Critical Habitat Assessment in compliance with PS6, that identifies project-related impacts, especially those on habitat connectivity outside the boundaries of the project site.	1. Copy of the Critical Habitat Assessment.	1. 7 days prior to the start of construction in areas of greater biodiversity values, or 90 days after signing the Loan Agreement, whichever comes first.
		2. Should a critical habitat be identified, develop a Biodiversity Action Plan (“BAP”) to achieve net gains after the Project execution,	2. Copy of the BAP, if necessary.	2. 7 days prior to the start of construction in the identified critical habitat area, or 90 days after signing the Loan Agreement, whichever comes first.
6.4	Invasive Alien Species	1. Develop and implement within the Flora Management Plan of the ESMP, guidelines to monitor the appearance of exotic flora species in roads ways, in the right of way of the transmission line and the solar panel areas during the Project operation, and for defining mitigation measures in case of need	1. Copy of the Guidelines	1. 15 days prior to operation
			2. Evidence of this implementation.	2. Together with each Annual ESHS Consolidated Report
6.5	Ecosystem Services	1. Develop within the updated Biodiversity Baseline Survey an Ecosystem Service Assessment for the water usage and water quality in temporary streams in the PA, during the construction phase	1. Copy of the Ecosystem Service Assessment	1. 7 days prior to the start of construction, or 90 days after signing the Loan Agreement, whichever comes first.

PS 8: Cultural Heritage				
8.1	Chance Find Procedure (“CFP”)	1. Prepare and implement a project-specific Chance Find Procedure and associated training.	1. Copy of the project-specific CFP.	1. 7 days prior to the start of construction, or 90 days after signing the Loan Agreement, whichever comes first.
			2. Evidence of this implementation.	2. Together with each Annual ESHS Consolidated Report