

**Bosques Solares Los Llanos - COLOMBIA  
Environmental and Social Action Plan (ESAP)**

No.	Aspect	Action	Deliverable	Delivery date
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>				
1.1	Legal Compliance	1. Request the Ministry of the Interior's Directorate of the National Authority for Prior Consultation to determine whether prior consultation is appropriate under the direct impact criterion, for the activities and area of influence defined for the transmission line.	1. Request for Applicability.	1. Three months after financial close.
1.2	Policy	1. Develop a Corporate Sustainability Policy for Matrix that defines its environmental and social objectives and principles and identifies the persons within the organization responsible for ensuring compliance and their implementation. 2. Implement a Corporate Sustainability Policy for Matrix. 3. Disseminate the Sustainability Policy at all levels of the organization.	1. Sustainability Policy. 2. Evidence of having implemented the policy. 3. Evidence of having disseminated the policy throughout the organization.	1. Prior to First Disbursement. 2. Prior to First Disbursement. 3. Prior to First Disbursement.
1.3	Identification of Risks and Impacts	1. Develop a Cumulative Impact Study for BSL 1, 2, and 3 using the methodology described in the IFC manual "Cumulative Impact Assessment and Management: A Guide for the Private Sector in Emerging Markets". 2. Conduct an inventory of flora and fauna in the protective forests adjacent to the project and included in the IAI. The report resulting from this inventory should highlight the presence of rare, endemic, legally protected or internationally important species. 3. Develop and implement a monitoring plan for flora and fauna in the protective forests included in the IAI and adjacent to the Project. The Plan must consider biannual monitoring events in order to evaluate whether the Project generates impacts on the forest. 4. Update the Emergency Plan to include: i) thunderstorm risk analysis and the established operating procedures for this; and ii) flood risk, in accordance with the hydrological study developed. 5. Consult annually, in the "Registration System of Abandoned and Forcibly Dispossessed Properties" (SRPADF, for its acronym in Spanish) of the Special Administrative Unit for Land Restitution Management, the status reported for the three (3) properties that comprise the Project's intervention area (BSL1, 2, and 3 and the transmission line). 6. Develop an analysis of climate change conditions to determine the timing of the construction of the work recommended in the hydrological study, should it be required according to the conclusions of the study.	1. Cumulative Impact Study. 2. Flora and fauna inventory report. 3. Flora and fauna monitoring plan and biannual monitoring reports. 4. Updated Emergency Response Plan. 5. Evidence of having carried out the consultation in the SRPADF on the status of the three properties of the Project site. 6. Analysis of climate change exposure conditions.	1. Nine months after financial close. 2. Nine months after financial close. 3. Nine months after financial close and then bi-annually for 3 years. 4. Six months after financial close. 5. Three months after financial close and then annually throughout the term of the contract. 6. Prior to First Disbursement.
1.4	Management Programs	1. Update management programs and measures in accordance with the impact review and updating, including cumulative impacts.	1. Updated management programs and measures.	1. One year after financial close.
1.5	Organizational Capacity and Competency	1. Define an organizational chart of Matrix professionals that will participate in the operation phase of the three BSLs, ensuring the inclusion of the roles responsible for socio-environmental and OHS management for the operation. Matrix will be able to contract, as planned, the operation and maintenance of the Project, including socio-environmental and OHS management, for the Project's operation phase. The organizational chart will reflect the roles and responsibilities of each of the parties, including Matrix and the contractors.	1. Organizational chart.	1. Three months after financial close.

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1.6	Stakeholder Engagement	<ol style="list-style-type: none"> <li>Execute information, participation and consultation activities in accordance with the Environmental Management Plan and the Stakeholder Identification and Communications Plan.</li> <li>Document the community engagement process to disclose information related to the risks, impacts, and opportunities of the Project during the operation stage of the three BSLs.</li> <li>Update the stakeholder identification process.</li> <li>Design a strategy to reestablish communication channels with the Alto Neblinas community and attend to the demands for information from the members of the territorial unit and in consideration of the environmental importance of the impacts that the community may receive.</li> </ol>	<ol style="list-style-type: none"> <li>Evidence of having implemented the corresponding activities (notices, minutes, records, attendance lists, photos).</li> <li>Media and records (notices of meetings, meeting minutes, and attendance list)</li> <li>Stakeholder identification matrix.</li> <li>Communication strategy and evidence of communication with the Alto Neblinas community.</li> </ol>	<ol style="list-style-type: none"> <li>Three months after financial close.</li> <li>Three months after financial close.</li> <li>Three months after financial close.</li> <li>One month after financial close and ongoing maintenance of communication channels.</li> </ol>
1.7	External Communication and Grievance Mechanisms	<ol style="list-style-type: none"> <li>Update the "Grievance Mechanism" of the Matrix Environmental and Social Guidelines Manual in accordance with: i) the stage of the Project, ii) the information requirements of the stakeholders and iii) the updated identification of the contextual, contractual, and customary stakeholders interested in or participating in the Project activities.</li> <li>Present statistics on complaints received and handled by the Grievance Mechanism.</li> <li>Disseminate the "Grievance Mechanism" to all identified stakeholders.</li> </ol>	<ol style="list-style-type: none"> <li>Updated Matrix "Grievance Mechanism".</li> <li>Database or system for registering grievances and complaints.</li> <li>Evidence of having disseminated the "Grievance Mechanism" to the Project's stakeholders.</li> </ol>	<ol style="list-style-type: none"> <li>Three months after financial close.</li> <li>Periodically as part of the Environmental and Social Compliance Report (ESCR).</li> <li>Four months after financial close.</li> </ol>
1.8	Ongoing Reporting to Affected Communities	<ol style="list-style-type: none"> <li>Periodically inform the affected communities on the progress of the Project and related issues.</li> </ol>	<ol style="list-style-type: none"> <li>Notices, minutes, attendance lists of the events held.</li> </ol>	<ol style="list-style-type: none"> <li>Four months after financial close and then periodically in the ESCR.</li> </ol>
<b>PS 2: Labor and Working Conditions</b>				
2.1	Human Resources Policies and Procedures	<ol style="list-style-type: none"> <li>Produce a "Human Resources Policy" for the Project that incorporates: i) the recognition of workers' right to privacy in relation to particular business operations, ii) the Company's willingness to promote gender equality and respect for the rights of people with disabilities.</li> <li>Implement the Project's Human Resources Policy.</li> </ol>	<ol style="list-style-type: none"> <li>Matrix Human Resources Policy.</li> <li>Evidence of its implementation.</li> </ol>	<ol style="list-style-type: none"> <li>Three months after financial close.</li> <li>Four months after financial close.</li> </ol>
2.2	Working Conditions and Terms of Employment	<ol style="list-style-type: none"> <li>Update Matrix's Environmental and Social Guidelines Manual by introducing a section on "working conditions and terms of employment" that commits to providing an optimal working environment in terms of physical environment, sanitation, safety measures, and access to sanitary facilities.</li> </ol>	<ol style="list-style-type: none"> <li>Updated Matrix Environmental and Social Guidelines Manual.</li> </ol>	<ol style="list-style-type: none"> <li>Three months after financial close.</li> </ol>
2.3	Non-discrimination and Equal Opportunity	<ol style="list-style-type: none"> <li>In relation to the Project, annually evaluate the performance of Matrix and the contractors involved in the operation of the Project in terms of gender equality. This shall include an evaluation of possible areas for improvement considering the characteristics of the Project and its location.</li> </ol>	<ol style="list-style-type: none"> <li>Gender equality analysis reports, including possible areas for improvement/opportunities.</li> </ol>	<ol style="list-style-type: none"> <li>Six months after financial close and then periodically as part of the ESCR.</li> </ol>
2.4	Grievance Mechanism	<ol style="list-style-type: none"> <li>Update Matrix's internal "Grievance Mechanism" (applicable to the Project): i) a specific format for consolidated tracking of complaints and grievances for the three solar parks, ii) a procedure for closing complaints and grievances, and iii) the necessary supporting documentation for closing complaints and grievances.</li> </ol>	<ol style="list-style-type: none"> <li>Updated internal Grievance Mechanism.</li> </ol>	<ol style="list-style-type: none"> <li>Six months after financial close.</li> </ol>
2.5	Workers Engaged by Third Parties	<ol style="list-style-type: none"> <li>Update the "Workers Engaged by Third Parties" section of the Matrix Environmental and Social Guidelines Manual to include that the ESMS of these companies will be evaluated.</li> <li>Execute the evaluation of contractors' ESMSs.</li> </ol>	<ol style="list-style-type: none"> <li>Updated Matrix's Environmental and Social Guidelines Manual.</li> <li>Evidence of the evaluations.</li> </ol>	<ol style="list-style-type: none"> <li>Three months after financial close.</li> <li>Six months after financial close.</li> </ol>

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<b>PS 3: Resource Efficiency and Pollution Prevention</b>				
3.1	Pollution Prevention	<ol style="list-style-type: none"> <li>Adapt the waste segregation, chemical product storage, and hazardous waste storage sites (ecological point).</li> <li>Incorporate the management of damaged or placed solar modules, transformers, and inverters into the Project's Environmental Management Plan.</li> </ol>	<ol style="list-style-type: none"> <li>Appropriate ecological point and chemical and hazardous waste storage sites.</li> <li>Project's Environmental Management Plan including the management of solar modules, transformers, and inverters.</li> </ol>	<ol style="list-style-type: none"> <li>Three months after financial close.</li> <li>Six months after financial close.</li> </ol>
3.2	Pesticide use and management	<ol style="list-style-type: none"> <li>Create a pesticide management protocol when the Project detects the need for pesticide use for forestry compensation or environmental management programs.</li> </ol>	<ol style="list-style-type: none"> <li>Pesticide management protocol.</li> </ol>	<ol style="list-style-type: none"> <li>One month prior to the start of pesticide use.</li> </ol>
<b>PS 4: Community Health, Safety, and Security</b>				
4.1	Emergency Preparedness and Response	<ol style="list-style-type: none"> <li>Communicate the "Emergency Plan" to the stakeholders involved in this matter.</li> </ol>	<ol style="list-style-type: none"> <li>Social stakeholder communication supports.</li> </ol>	<ol style="list-style-type: none"> <li>Six months after financial close.</li> </ol>
4.2	Security Personnel	<ol style="list-style-type: none"> <li>Require the security company to train and educate security guards on human rights and proportional use of force.</li> </ol>	<ol style="list-style-type: none"> <li>Training records, attendance lists, evaluations.</li> </ol>	<ol style="list-style-type: none"> <li>Three months after financial close.</li> </ol>
<b>PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>				
6.1	Protection and Conservation of Biodiversity	<ol style="list-style-type: none"> <li>Propose management measures for identified habitats in the event that previously unidentified significant impacts or impacts with a magnitude materially greater than expected in the environmental impact studies are identified as being generated by the Project.</li> <li>Develop a long-term biodiversity monitoring and evaluation program to assess the success of the applicable biodiversity offsets implemented (e.g. forest establishment and management plan).</li> <li>Establish an invasive species management procedure as part of the forest establishment and management plan.</li> <li>Train personnel in the identification and control of invasive species.</li> <li>Define a procedure to verify the origin of plant material to be used in reforestation activities associated with the Project.</li> </ol>	<ol style="list-style-type: none"> <li>Management measures.</li> <li>Biodiversity monitoring and assessment program for biodiversity offsets for biodiversity loss.</li> <li>Invasive Species Management Procedure.</li> <li>Personnel training plan for identification and control of invasive species.</li> <li>Procedure for verifying the origin of plant material for Project offsets.</li> </ol>	<ol style="list-style-type: none"> <li>Nine months after financial close.</li> <li>One year after financial close.</li> <li>One year after financial close.</li> <li>Four months after financial close.</li> <li>Four months after financial close.</li> <li>Four months after financial close.</li> </ol>