

## PPP Vial Circuito 6 - URUGUAY Environmental and Social Action Plan

No.	Aspect	Action Item	Deliverable	Date of compliance
<b>PS 1: Assessment and Management of E&amp;S Risks and Impacts</b>				
1.1	Integrated Management System	Develop and implement an Integrated Environmental, Social, and Health and Safety Management System (IMS) applicable to work fronts, quarries and surplus material deposit sites incorporating: i) the Environmental Management Plans approved by the DINAMA; ii) the Health and Safety Plan approved by the Ministry of Labor and Social Security ("MTSS", for its acronym in Spanish) for each Project component; and iii) the requirements of this Environmental and Social Action Plan (ESAP).	<ol style="list-style-type: none"> <li>Proposal of the Integrated Environmental, Social, and Health and Safety Management System</li> <li>Evidence of the implementation of the Integrated Environmental, Social, and Health and Safety Management System</li> </ol>	<ol style="list-style-type: none"> <li>Prior to the first disbursement</li> <li>Prior to the second disbursement</li> </ol>
		Provide minimum full-time personnel for the implementation of the IMS: i) an Environmental, Social, and Health and Safety Manager; ii) a Health and Safety professional; iii) a social issues technician specialist; and iv) an archeologist to act in the event of chance finds.	Documentary evidence of the incorporation of the required personnel in charge	Prior to the first disbursement
1.2	Environmental, Social, and Health and Safety Policy of the Project	Prepare and adopt an Environmental, Social, and Health and Safety Management Policy for the Project, whose objectives will explicitly incorporate the legal and PS requirements applicable to the Project regarding environmental, labor, working conditions, resource efficiency, pollution prevention, community health and safety, and biodiversity conservation and cultural heritage.	<ol style="list-style-type: none"> <li>Environmental, Social, and Health and Safety Policy for the Project</li> <li>Evidence of its adoption</li> </ol>	<ol style="list-style-type: none"> <li>Prior to the first disbursement</li> <li>Prior to the second disbursement</li> </ol>
1.3	Identification of Environmental and Social Aspects, Occupational Risks and Legal Issues	<ol style="list-style-type: none"> <li>Prepare and maintain an identification and assessment matrix related to environmental and social aspects.</li> <li>Prepare and maintain an occupational risk identification matrix.</li> <li>Prepare and maintain an identification and assessment matrix related to legal aspects.</li> </ol>	<ol style="list-style-type: none"> <li>Environmental and social aspects identification and assessment matrix</li> <li>Occupational risks identification and assessment matrix</li> <li>Legal aspects identification and assessment matrix</li> </ol>	<ol style="list-style-type: none"> <li>Prior to the first disbursement and periodically in Environmental and Social Compliance Reports (ESCR)</li> <li>Prior to the first disbursement and periodically in the ESCRs</li> <li>Prior to the first disbursement and periodically in the ESCRs</li> </ol>

No.	Aspect	Action Item	Deliverable	Date of compliance
1.4	Management Programs	Prepare administrative procedures for each of the plans, programs and specific instructions in the Environmental Management Plan and Health and Safety Plan, including the following sections: i) purpose of the procedure; ii) scope; iii) references (to related applicable standards and documentation); iv) responsibilities; v) management methodologies (specifying the training if required); vi) records; and vii) annexes (including formats of procedure application records and a copy of any other relevant document where appropriate).	<ol style="list-style-type: none"> <li>1. Operational procedures of IMS</li> <li>2. Evidence of its adoption</li> </ol>	<ol style="list-style-type: none"> <li>1. Prior to the second disbursement</li> <li>2. Prior to the third disbursement</li> </ol>
1.5	Training	Develop and implement bi-yearly Environmental, Social, and Health and Safety Training Plans including the training topics set forth in the Environmental and Social Management Plan , in the Health and Safety Plan of the Project emphasizing the issues related to safety in vehicle and machinery driving inside and outside the work fronts, quarries and borrow areas.	<ol style="list-style-type: none"> <li>1. First Bi-Yearly Training Plan</li> <li>2. Implementation evidence</li> </ol>	<ol style="list-style-type: none"> <li>1. Prior to the first disbursement</li> <li>2. Prior to the second disbursement</li> </ol>
1.6	Emergency Management	Develop and implement an Emergency Preparedness and Response Plan for each operating unit of the Project (construction site, quarry, etc.) identifying: i) site-specific emergency scenarios; ii) actions to prevent or address the emergency; iii) personnel responsibilities under the Plan (including those related to holidays and weekends); iv) identification of external players potentially involved during an emergency (hospitals, firefighters, police, civil defense, etc.); v) communications and decision-making authority flow chart; and iv) an evacuation plan included in a chart where appropriate: a) meeting points; b) emergency exits; and c) the location of equipment and facilities for fire extinction, flammable materials storage rooms, energy cut points, among others.	<ol style="list-style-type: none"> <li>1. Emergency Preparedness and Response Plan</li> <li>2. Implementation evidence</li> </ol>	<ol style="list-style-type: none"> <li>1. Prior to the first disbursement</li> <li>2. Prior to the third disbursement</li> </ol>
		Continuously and randomly perform drills for the scenarios determined in the Plans.	Drill reports	In each ESCR
1.7	Accident Management	Develop and implement a specific procedure to manage accidents applicable to payroll and outsourced personnel whose content: i) ensures compliance with the legal requirements included in the Health and Safety Plan; ii) identifies the actions to be immediately applied in the event of an accident; and iii) includes instructions to record the nature and severity of the accident, undertake the necessary actions to comply with the legal formalities, the format of the accident investigation report and the identification of the preventive and corrective measures adopted to prevent them from happening again.	<ol style="list-style-type: none"> <li>1. Accidents Management Procedures</li> <li>2. Implementation evidence</li> </ol>	<ol style="list-style-type: none"> <li>1. Prior to the first disbursement</li> <li>2. Prior to the second disbursement</li> </ol>

No.	Aspect	Action Item	Deliverable	Date of compliance
1.8	Goods and Service Providers Management	Develop and implement Goods and Service Providers Rules including: i) the obligation of those operating quarries to manage all the E&S impacts and occupational risks in accordance with effective legislation and the Consortium's IMS; ii) the obligation to meet the Environmental, Social, and Health and Safety Policy and the Human Resources Policy of the Consortium; ii) the minimum personnel requirements that the provider should meet to manage environmental, social, and health and safety issues; iii) the list of all programs, plans and procedures in the Consortium's IMS applicable to the provider; iv) the specific environmental, social, and health and safety training requirements; v) the Road Safety Plan; vi) the Stakeholder Engagement Plan; and vii) grievance and claim mechanisms for outsourced workers.	<ol style="list-style-type: none"> <li>1. Goods and Service Providers Rules</li> <li>2. Implementation evidence</li> </ol>	<ol style="list-style-type: none"> <li>1. Prior to the first disbursement</li> <li>2. Prior to the second disbursement</li> </ol>
1.9	Environmental, Social, and Health and Safety Monitoring	<p>i) Develop and implement an Environmental, Social, and Health and Safety Plan to monitor the following parameters: i) those required by authorities in the different environmental plans and the Health and Safety Plan; ii) labor noise and labor air quality levels at critical work positions; iii) water quality for human consumption (bi-yearly); iv) accident frequency and severity rates for payroll and outsourced employees (monthly); v) electric panel earthing resistance values (bi-yearly); vi) incident and unsafe working conditions records at work fronts (monthly); vii) records of occupational illnesses and COVID-19 cases management (monthly); viii) number of community claims received and resolved (monthly); ix) amount of water, energy and inputs used and waste generated (monthly); and x) contents and number of training courses taught (monthly). The limit values of the parameters measured will be the statutory ones or those of the applicable IFC Guidelines (whichever more demanding).</p> <p>ii) Submit the corrective measures to be adopted if the values evidenced exceed guideline limits.</p>	<ol style="list-style-type: none"> <li>1. Environmental, Social, and Health and Safety Monitoring Plan</li> <li>2. Implementation evidence</li> </ol>	<ol style="list-style-type: none"> <li>1. Prior to the first disbursement</li> <li>2. Prior to the second disbursement</li> </ol>
1.10	Stakeholder Engagement	Develop and implement a Stakeholders Engagement Plan considering: i) preparation and maintenance of a map of the Project's stakeholders; ii) Project dissemination activities addressed to members of the community; iii) social management procedures for quarry blasting events; iv) prior technical review of the dwelling homes potentially affected by quarry blasting considering their proximity to the epicenter of the explosions; and v) application of the grievance and claims mechanism. The responsibility for implementing this plan will be shared by the companies managing the Project quarries.	<ol style="list-style-type: none"> <li>1. Stakeholders Engagement Plan</li> <li>2. Implementation evidence</li> </ol>	<ol style="list-style-type: none"> <li>1. Prior to the first disbursement</li> <li>2. Prior to the second disbursement</li> </ol>

No.	Aspect	Action Item	Deliverable	Date of compliance
1.11	Third-party Grievance Mechanism	Develop and implement a third-party Grievance Mechanism including the possibility to receive grievances and claims anonymously. The mechanism will clearly establish the responsibilities assigned and the assessment and response times for the statements made.	<ol style="list-style-type: none"> <li>Grievance Mechanism</li> <li>Implementation evidence</li> </ol>	<ol style="list-style-type: none"> <li>Prior to the first disbursement</li> <li>Prior to the second disbursement</li> </ol>
<b>PS 2. Labor and Working Conditions</b>				
2.1	Human Resources Policy	Develop and implement a Human Resources Policy for the Project applicable to payroll as well as outsourced personnel.	<ol style="list-style-type: none"> <li>Project Human Resources Policy</li> <li>Implementation evidence</li> </ol>	<ol style="list-style-type: none"> <li>Prior to the first disbursement</li> <li>Prior to the second disbursement</li> </ol>
2.2	Women Engagement	Promote and monitor women engagement as part of the labor force.	<ol style="list-style-type: none"> <li>Report of women engagement as part of the labor force</li> </ol>	<ol style="list-style-type: none"> <li>In each ESCR</li> </ol>
2.3	Retrenchment	Analyze alternatives to retrenchment mitigating any potential adverse impacts to be generated by this process and meeting all the related legal and contractual requirements.	<ol style="list-style-type: none"> <li>Labor Force Retrenchment Plan</li> <li>Implementation evidence</li> </ol>	<ol style="list-style-type: none"> <li>3 months before the end of the Project's construction phase</li> <li>3 months before the end of the Project's construction phase</li> </ol>
2.4	Internal Grievance Mechanism	Develop and implement a mechanism to receive and resolve grievances and claims for payroll and outsourced personnel including the possibility to file grievances and claims anonymously, establish the persons in charge of managing them and determine the terms for evaluation and response of personnel grievances.	<ol style="list-style-type: none"> <li>Internal Grievance Mechanism</li> <li>Implementation evidence</li> </ol>	<ol style="list-style-type: none"> <li>Prior to the first disbursement</li> <li>Prior to the second disbursement</li> </ol>
<b>PS 3: Resource Efficiency and Pollution Prevention</b>				
3.1	Resource Efficiency	Generate records of the monthly water and energy consumption; aggregate, concrete, asphalt consumption; and the amount and use of generated or recycled waste.	Consumption records	In each ESCR

No.	Aspect	Action Item	Deliverable	Date of compliance
3.2	Greenhouse Gases	<ol style="list-style-type: none"> <li>1. Prepare a GHG inventory for the construction stage.</li> <li>2. Submit the emissions estimations for the following year.</li> <li>3. Submit the calculation of prior-year emissions.</li> </ol>	<ol style="list-style-type: none"> <li>1. GHG inventory for construction phase</li> <li>2. Estimations for the following year</li> <li>3. Calculation of emissions for the prior year</li> </ol>	<ol style="list-style-type: none"> <li>1. Prior to the first disbursement</li> <li>2. In Q4 of the year ending</li> <li>3. In Q1 of the year beginning</li> </ol>
3.3	Waste Management	Develop and implement a waste management procedure including record formats to quantify and record the amount and type of waste managed.	<ol style="list-style-type: none"> <li>1. Waste Management Procedure</li> <li>2. Implementation evidence</li> </ol>	<ol style="list-style-type: none"> <li>1. Prior to the first disbursement</li> <li>2. Prior to the second disbursement</li> </ol>
3.4	Hazardous Substances Management	Develop and implement a procedure to manage hazardous substances including an express ban on the acquisition and use of pesticides and chemical substances including any Class Ia (extremely hazardous) or Ib (highly hazardous) component under the WHO's classification.	<ol style="list-style-type: none"> <li>1. Hazardous Substances Management Procedure.</li> <li>2. Implementation evidence</li> </ol>	<ol style="list-style-type: none"> <li>1. Prior to the first disbursement</li> <li>2. Prior to the third disbursement</li> </ol>
<b>PS 4: Community Health and Safety</b>				
4.1	Road Safety	Prepare and implement a Road Safety Plan applicable to the whole Project construction area and mandatory for both payroll and outsourced personnel, which considers: i) that all truck or machinery drivers, whether owned or rented, attend compulsory defensive driving courses; ii) random alcohol and drugs screening tests to truck and owned or rented machinery drivers; iii) identification of sensitive sites along the routes of trucks and owned or hired light vehicles personnel (e.g., schools, hospitals and tourist sites with large concentrations of public) establishing specific driving guidelines in certain sites (such as maximum speeds in certain stretches); iv) good behavior standards when dealing with members of the community; and v) coordination activities with local authorities and road police (to implement detours and the increase in road safety at night or in the event of bad weather conditions).	<ol style="list-style-type: none"> <li>1. Road Safety Plan</li> <li>2. Implementation evidence</li> </ol>	<ol style="list-style-type: none"> <li>1. Prior to the first disbursement</li> <li>2. Prior to the second disbursement</li> </ol>
<b>PS 5: Land Acquisition and Involuntary Resettlement</b>				

No.	Aspect	Action Item	Deliverable	Date of compliance
5.1	Land Expropriation and Involuntary Resettlement	<ol style="list-style-type: none"> <li>1. Monitor the expropriation and reestablishment of means of livelihood plan carried out by the MTOP.</li> <li>2. Collaborate with authorities, if the Consortium is allowed to do so, to ensure that the results of any potential physical or economic displacement processes are consistent with PS 5.</li> </ol>	<ol style="list-style-type: none"> <li>1. Monitoring Report</li> <li>2. Minutes of meetings with related authorities</li> </ol>	<ol style="list-style-type: none"> <li>1. In each ESCR</li> <li>2. In each ESCR</li> </ol>
<b>PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>				
6.1	Impact on Vegetation	Develop and implement the Invasive Forest Flora Control Program described in the Environmental Management Plan of the San Ramón bypass allowing to monitor the actions performed and results obtained.	<ol style="list-style-type: none"> <li>1. Invasive Forest Flora Control Program</li> <li>2. Implementation evidence</li> </ol>	<ol style="list-style-type: none"> <li>1. Prior to the third disbursement</li> <li>2. During the San Ramón bypass works</li> </ol>
<b>PS 8: Cultural Heritage</b>				
8.1	Archeological Chance Finds	Develop and adopt an archeological chance find procedure applicable to the layout and quarries.	<ol style="list-style-type: none"> <li>1. Archeological chance find procedure</li> <li>2. Implementation evidence</li> </ol>	<ol style="list-style-type: none"> <li>1. Prior to the first disbursement</li> <li>2. In each ESCR, as appropriate</li> </ol>