

Environmental and Social Action Plan (ESAP)					
<b>Project Name:</b>	San Cristobal Green Academics & Sports Campus	<b>Project ID:</b>	13572-01	<b>Category:</b>	B
<b>Sector:</b>	EDUCATION	<b>Country:</b>	Guatemala		

No.	Deliverable	Compliance Date
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>		
<b>1.1 Policy</b>		
1.1.1	Disseminate the Integrated Policy inside and outside the Company.	
a.	Evidence of dissemination.	As a prerequisite to the first disbursement.
<b>1.2 Identification of Risks and Impacts</b>		
1.2.1	Submit the Environmental and Social Impact Assessment (ESIA) approved by the Ministry of Environment and Natural Resources ("MARN"), together with its respective resolution.	
a.	MARN Resolution approving the ESIA.	As a prerequisite to the first disbursement.
1.2.2	Develop a Road Impact Study ("RIS") identifying the direct and indirect impacts on roads, infrastructure, neighboring residents, and access road users, as a result of the increase in vehicular traffic that will occur during the Project's construction and operation.	
a.	Road Impact Study.	As a prerequisite to the first disbursement.
1.2.3	Develop a procedure to systematically identify, characterize, and evaluate the environmental and social ("E&S") and Occupational Health and Safety ("OHS") risks and impacts generated by the different phases of the Project.	
a.	Procedure to identify E&S and OHS risks and impacts.	As a prerequisite to the first disbursement.
b.	Construction Phase Risk Matrix.	As a prerequisite to the first disbursement.
c.	Operation Phase Risk Matrix.	30 days prior to the start of operations.
1.2.4	Implement the procedure to systematically identify, characterize, and evaluate environmental and social ("E&S") and Occupational Health and Safety ("OHS") risks and impacts.	
a.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>1.3 Management Programs</b>		
1.3.1	Develop procedures to manage each of the E&S risks and impacts identified during the Project construction phase.	
a.	Air Quality Management Procedure (noise, emissions, particulate matter).	As a prerequisite to the first disbursement.
b.	Excavation and Backfill Management Procedure.	As a prerequisite to the first disbursement.
c.	Water Resource Management Procedure.	As a prerequisite to the first disbursement.
d.	Waste management procedure.	As a prerequisite to the first disbursement.
e.	Vector Management Procedure.	As a prerequisite to the first disbursement.
1.3.2	Incorporate Contractors' obligation to comply with the Project's management plans in the Construction Contracts.	
a.	Copy of the clauses included in the Construction contracts.	As a prerequisite to the first disbursement.
1.3.3	Update procedures to manage each of the E&S risks and impacts identified during the Project operation phase.	
a.	Water Resource Management Procedure.	30 days prior to the start of operations.
b.	Waste management procedure.	30 days prior to the start of operations.
c.	Vector Management Procedure.	30 days prior to the start of operations.
<b>1.4 Organizational Capacity and Competency</b>		
1.4.1	Complete the recruitment of environmental and social staff.	
a.	Evidence of Hiring an OHS Professional.	As a prerequisite to the first disbursement

b.	Evidence of hiring an HSE Assistant.	As a prerequisite to the first disbursement.
<b>1.5 Emergency Preparedness and Response</b>		
1.5.1	Develop an Emergency Preparedness and Response Plan ("EPRP") for all phases of the Project incorporating all emergency scenarios listed in the ESIA.	
a.	Emergency Preparedness and Response Plan ("EPRP").	As a prerequisite to the first disbursement.
b.	Implement the EPRP.	30 days prior to the start of operations.
1.5.2	Implement the Emergency Preparedness and Response Plan ("EPRP") for all phases of the Project.	
a.	Evidence of implementation.	As part of the ESCR.
1.5.3	Update EPRP for the Project's operation phase.	
a.	Updated EPRP.	30 days prior to the start of operations.
<b>1.6 Monitoring and Review</b>		
1.6.1	Develop a procedure to follow up on the Project's environmental, social, labor, and OHS performance, including aspects such as: accident records, internal and external grievance management, waste and effluent management, emissions, noise during the construction phase, water consumption and water table records, biodiversity conservation.	
a.	Monitoring and Review procedure.	As a prerequisite to the first disbursement.
1.6.2	Develop a Contractor Management and Assurance Plan ("CMAP") to monitor Contractor's environmental and social performance.	
a.	Contractor Management and Assurance Plan.	As a prerequisite to the first disbursement.
<b>1.7 Community Grievance Mechanism</b>		
1.7.1	Develop and implement a mechanism for external stakeholders to submit their Queries, Complaints, Claims and Grievances.	
a.	External Grievance Mechanism.	As a prerequisite to the first disbursement.
b.	Implement the External Grievance Mechanism.	As part of the ESCR.
<b>PS 2: Labor and Working Conditions</b>		
<b>2.1 Human Resources Policies and Procedures</b>		
2.1.1	Develop a Human Resources Policy and Procedure.	
a.	Human Resources Policy.	As a prerequisite to the first disbursement.
b.	Human Resources Procedure.	As a prerequisite to the first disbursement.
c.	Internal Labor Regulations.	30 days prior to the start of operations.
2.1.2	Develop a Human Resources Policy and Procedure.	
a.	Evidence of having implemented the Human Resources Policy.	As part of the ESCR.
b.	Evidence of implementing Human Resources Procedures.	As part of the ESCR.
c.	Evidence of implementing the Internal Labor Regulations.	As part of the ESCR.
<b>2.2 Internal Grievance Mechanism</b>		
2.2.1	Develop a grievance mechanism for direct employees and workers engaged by third parties.	
a.	<b>Internal Grievance Mechanism</b>	As a prerequisite to the first disbursement.
2.2.2	Implement the Internal Grievance Mechanism.	
a.	Evidence of implementation.	As a prerequisite to the first disbursement.
<b>2.3 Occupational Health and Safety</b>		
2.3.1	Develop the Occupational Health and Safety Management System (OHS)..	
a.	OHS Manual	As a prerequisite to the first disbursement.
b.	Protocols for managing OHS risks, including i) Personal Protective Equipment matrices; ii) work at heights, iii) confined work, iv) management of scaffolding, platforms, and ladders.	As a prerequisite to the first disbursement.
2.3.2	Update the OHS System for the operation phase.	
a.	Updated OHS System.	30 days prior to the start of operations.
<b>2.4 Supply Chain</b>		
2.4.1	Develop a procedure to identify and manage EHS risks in the supply chain.	

a.	Supply chain management procedure	As a prerequisite to the first disbursement.
2.4.2	Implement the procedure to identify and manage E&S risks in the supply chain.	
a.	Evidence of implementation.	As part of the ESCR.
<b>PS 3: Resource Efficiency and Pollution Prevention</b>		
<b>3.1 Greenhouse Gases</b>		
3.1.1	Annually report the Greenhouse Gases (GHG) inventory covering Scopes 1 and 2 as prescribed in the GHG protocol of the World Resources Institute and the World Business Council for Sustainable Development.	
a.	GHG inventory	Together with each Environmental and Social Compliance Report (ESCR).
<b>PS 4: Community Health, Safety, and Security</b>		
<b>4.1 Infrastructure and Equipment Design and Safety</b>		
4.1.1	Submit a certification issued by an engineer certified by the National Fire Protection Association of the United States (NFPA) that the Project's buildings and other infrastructure have been designed to comply with local building codes and NFPA Life and Fire Safety (L&FS) standards.	
a.	Certification as an NFPA accredited engineer.	As a prerequisite to the first disbursement.
4.1.2	Submit a certification issued by an engineer certified by the NFPA, that the Project's buildings and other infrastructure have been built following the approved L&FS designs.	
a.	Certification as an NFPA accredited engineer.	As a condition of the Technical Completion Date.
<b>4.2 Community Health and Safety</b>		
4.2.1	Develop a Code of Conduct.	
a.	Code of Conduct..	As a prerequisite to the first disbursement.
4.2.2	Develop a procedure to manage the influx of workers	
a.	Procedure to manage the influx of workers.	As a prerequisite to the first disbursement.
<b>4.3 Security Personnel</b>		
4.3.1	Develop a procedure to i) assess and manage physical security risks, ii) document the need to hire armed personnel and the requirement to hire female security personnel, and ii) include the Code of Conduct for security personnel and the need for frequent training.	
a.	Physical Safety Management Procedure.	As a prerequisite to the first disbursement.
4.3.2	Include in the contract with the security services provider: i) the requirement that the security services provider complies with the requirements of the Physical Security Procedure; ii) the guidelines reflected in the IFC Good Practice Handbook on the Use of Security Forces: Assessing and Managing Risks and Impacts to reflect the requirements of PS-4.	
a.	Physical Security Contract.	As a prerequisite to the first disbursement.
<b>PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>		
<b>6.1 Protection and Conservation of Biodiversity</b>		
6.1.1	Develop a Fauna and Flora Rescue Procedure.	
a.	Fauna and Flora Rescue Procedure.	As a prerequisite to the first disbursement.
<b>PS 8: Cultural Heritage</b>		
<b>8.1 Chance Find Procedure</b>		
8.1.1	Develop a Chance Find Procedure.	
a.	Chance Find Procedure.	As a prerequisite to the first disbursement.