

**Lucayas Solar Power Limited, The Bahamas
Environmental and Social Action Plan (ESAP)**

No.	Aspect	Action	Deliverable	Delivery date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Assessment and Management of Environmental and Social Risks	1. Acquire all the environmental and construction permits and licenses required as per local legislation.	1. Copies of all required permits and licenses.	1. Prior to order to proceed.
1.2	E&S Assessment and Management System	1. Prepare a consolidated, Project-specific Environmental and Social Management System ("ESMS"), that includes: (i) organigram, (ii) risk and impact matrices for the construction and operation phases, (iii) all relevant Environmental, Social, Health & Safety management plans and procedures, and (iv) External and Internal Grievance Mechanisms.	1. Project-specific ESMS documentation.	1. Prior to first disbursement.
		2. Implement the Project-specific Environmental and Social Management System ("ESMS")	2. Evidence of implementation	2. As part of the Environmental and Social Compliance Report ("ESCR").
1.3	Organizational Capacity and Competency	1. Appoint a Grievance Officer to manage the Internal and External Grievance Mechanisms and the Stakeholder Engagement Plan ("SEP").	1. Evidence of appointment.	1. Prior to first disbursement.
1.4	Identification of Risks and Impacts	1. As part of the ESMS, complete the Hurricane Plan.	1. Hurricane Plan.	1. Prior to first disbursement.
1.5	Emergency Preparedness and Response	1. As part of the ESMS, update the Emergency Response Procedure ("ERP") to be Project-specific and include: (i) battery fire and explosion risks, (ii) natural disaster risks, (iii) L&FS training to workers, and (iv) emergency monitoring mechanisms.	1. ERP.	1. Prior to first disbursement.
1.6	Stakeholder Engagement	1. As part of the ESMS, develop a Project-specific Stakeholder Engagement Plan ("SEP") that includes: (i) a stakeholder map; (ii) disclosure mechanism; and (iii) a monitoring and review system.	1. SEP.	1. Prior to first disbursement.
		2. Implement the Project-specific Stakeholder Engagement Plan.	2. Evidence of implementation.	2. As part of the ESCR.
1.7	External Communication and Grievance Mechanisms	1. Develop a Project-specific External Grievance Mechanism ("EGM") that includes, among others: (i) means to receive and register public claims and grievances, including anonymous grievances, (ii) methods to screen and assess the grievances, (iii) a procedure to answer claimants; and (iv) an outline of the maximum duration of each grievance procedure phase.	1. EGM as part of the ESMS.	1. Prior to first disbursement.
		2. Implement the External Grievance Mechanism ("EGM").	2. Evidence of implementation.	2. As part of the ESCR.
PS 2: Labor and Working Conditions				
2.1	Labour and Working Conditions	1. Prepare an umbrella and Project-specific Human Resources ("HR") Policy.	1. HR Policy as part of the ESMS.	1. Prior to first disbursement.
		2. Adopt and disseminate the HR Policy.	2. Evidence of the adoption.	2. Prior to first disbursement.
2.2	Supply Chain	1. Adopt the Solar Energy Industries Association ("SEIA") Solar Equipment Buyers' Guide for Supply Chain Traceability and the Solar Supply Chain Traceability Protocol Industry Guidance.	1. Evidence of the adoption.	1. Prior to first disbursement.
2.3	Grievance Mechanism	1. Prepare a Project-specific Internal Grievance Mechanism ("IGM") that includes, among others: (i) anonymous means for workers to register workplace concerns, (ii) accessibility to all workers, (iii) procedures to screen and assess grievances, (iv) a procedure to answer workers; and (v) an outline of the maximum duration of each grievance procedure phase.	1. IGM as part of the ESMS.	1. Prior to first disbursement.
		2. Implement a Project-specific Internal Grievance Mechanism ("IGM").	2. Evidence of implementation	2. As part of the ESCR.
PS 3: Resource Efficiency and Pollution Prevention				

No.	Aspect	Action	Deliverable	Delivery date
3.1	Pollution Prevention	1. Update the Environmental Management Plan ("EMP") to include: (i) reuse and recycling procedures for hazardous solar PV wastes, and (ii) security hiring practices that follow Good International Industrial Practice (e.g., the United Nation's ("UN") Code of Conduct for Law Enforcement Officials).	1. EMP.	1. Prior to first disbursement.
		2. Implement the Environmental Management Plan ("EMP").	2. Evidence of implementation.	2. As part of the ESCR.
PS 4: Community Health, Safety, and Security				
4.1	Community Health and Safety	1. Prepare a Project-specific Traffic Management Program ("TMP").	1. TMP.	1. Prior to first disbursement.
		2. Implement a Project-specific Traffic Management Program ("TMP").	2. Evidence of implementation.	2. As part of the ESCR.