

Environmental and Social Action Plan (or ESAP)

Project Name:	GIM Habitacional	Project ID:	13454-01	Category:	B
Sector:	Industry	Country:	Mexico		

No.	Action	Deliverable	Delivery date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts			
1.1	Reference: Policy		
1.1.1	Develop an integrated environmental, social, and occupational health and safety policy that specifies the following: (i) the person within the organization responsible for ensuring compliance with the policy, for its implementation and for obtaining the resources required to implement it; (ii) how this policy will be communicated at all levels of the organization; and (iii) the mechanism for measuring and communicating continuous improvements to its implementation.	Integrated environmental, social and OHS policy.	30 days after the Closing Date.
1.1.2	Communicate the Integrated Policy to all GIM Group employees, including contractors, temporary employees, and other external stakeholders.	Evidence of having communicated the Integrated Policy to employees, contractors, and the main suppliers.	60 days after the Closing Date.
1.2	Reference: Identification of Risks and Impacts		
1.2.1	Develop a corporate procedure to identify, describe and assess the Environmental and Social (E&S), Occupational Health and Safety (OHS), and community health and safety risks and impacts caused by its projects that includes: (i) standard terms of reference for conducting Environmental and Social Impact Assessments (ESIA) for new developments; (ii) a baseline matrix of E&S and OHS risks and impacts; (iii) a general analysis of potential risks caused by climate change; (iv) guidelines for monitoring and evaluating risk management activities; and (v) indicative indices and the frequency of regular reporting to senior management on GIM's E&S performance.	Risk and Impact Identification Procedure.	150 days after the Closing Date.
1.2.2	Implement the Risk and Impact Identification Procedure.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
1.3	Reference: Management Programs		
1.3.1	Develop E&S and OHS training plans for Migdal's construction employees, managers, and subcontractors.	Training plan.	360 days after the Closing Date.
1.3.2	Implement the Training plan.	Evidence of implementation.	As part of the ESCR.
1.4	Reference: Organizational Capacity and Competency		
1.4.1	Submit the terms of reference for hiring a corporate employee with specific and exclusive responsibility for managing E&S issues.	Terms of Reference for the E&S Manager.	Prior to Financial Closing.
1.4.2	Appoint an interim E&S Manager.	Copy of the appointment of the interim E&S Manager.	Prior to Financial Closing.
1.4.3	Recruit or appoint a permanent E&S Manager.	Copy of the appointment of the permanent E&S Manager.	90 days after the Closing Date.
1.5	Reference: Emergency Preparedness and Response		
1.5.1	Update the Emergency Plan to include: i) community participation; and ii) emergency preparedness and response training.	Updated Emergency Plan.	270 days after the Closing Date.
1.6	Reference: Monitoring and Review		

1.6.1	Develop a procedure to monitor and evaluate ESMS implementation that includes: i) a compliance matrix with key performance indicators (KPIs); and ii) internal or external auditing procedures to assess the compliance status with E&S and OHS policies and measures, as established in Mexican standards and the IDB Invest Sustainability Policy.	Monitoring and Review Procedure.	270 days after the Closing Date.
1.6.2	Implement the Monitoring and Review procedure.	Evidence of implementation.	As part of the ESCR.
1.7	Reference: Stakeholder Engagement		
1.7.1	Develop a Stakeholder Map for projects under development and construction.	Stakeholder Map.	120 days after the Closing Date.
1.7.2	Develop a corporate procedure for managing engagement with the community and other stakeholders.	Stakeholder Engagement Plan.	360 days after the Closing Date.
1.7.3	Implement the Stakeholder Engagement Plan.	Evidence of implementation.	As part of the ESCR.
1.8	Reference: External Communication and Grievance Mechanisms		
1.8.1	Develop a grievance mechanism for communities to submit inquiries, concerns or formal complaints that includes: i) how to record complaints and grievances (telephone number, website, and email address); ii) the deadline for responding to complaints; iii) the appointment of an employee or team to receive, record, validate, investigate, and select alternative responses to external communications from the public; and iv) the guidelines for monitoring, documenting, and communicating responses to complainants.	External Grievance Mechanism.	150 days after the Closing Date.
1.8.2	Implement the External Grievance Mechanism.	Evidence of implementation.	As part of the ESCR.
PS 2: Labor and Working Conditions			
2.1	Reference: Human Resources Policies and Procedures		
2.1.1	Update the Human Resources Policies to include explicit references to: i) the right to free association; ii) collective bargaining; and iii) the right of employees to submit their grievances without fear of retaliation.	Updated Human Resources Policies.	120 days after the Closing Date.
2.1.2	Update induction procedures for direct employees and contractors to explain their employment and working conditions, the most important OHS aspects that relate to their daily tasks, the internal grievance mechanism, and the procedures regarding E&S issues.	Updated Induction Procedures.	180 days after the Closing Date.
2.2	Reference: Grievance Mechanism		
2.2.1	Develop an internal grievance mechanism similar to the external grievance mechanism, but with provisions that address sexual harassment and violence in the workplace.	Internal Grievance Mechanism.	120 days after the Closing Date.
2.2.2	Implement the Grievance Mechanism.	Evidence of implementation.	As part of the ESCR.
2.3	Reference: Occupational Health and Safety		
2.3.1	Develop corporate OHS procedures based on an occupational risks analysis that addresses the following critical areas (the "Critical Areas"): i) collective and personal protective equipment (scaffolding and PPE); ii) work at heights; iii) COVID-19 infection prevention; iv) sanitary facilities; v) hygiene and safety measures at construction sites; vi) medical facilities; vii) OHS training; and viii) the internal grievance mechanism.	ESMS Procedures for Critical Areas.	270 days after the Closing Date.
2.3.2	Conduct a Gap Analysis of the company's OHS management system that refers to international standards such as ISO 45001 and OSHA ("Gap Analysis"). Submit a corrective plan and schedule to IDB Invest that describes the measures to close the gaps, while developing and improving its procedures (the	<ol style="list-style-type: none"> Terms of Reference and Purchase Order to contract the Gap Analysis. Gap Analysis and Corrective Action Plan. 	<ol style="list-style-type: none"> Prior to the Closing Date. 180 days after the Closing Date.

	"Corrective Action Plan"). The Corrective Action Plan shall prioritize the ESMS procedures to be developed/updated within critical areas to prevent common accidents.		
2.3.3	Develop a procedure within the ESMS to train current and future employees, supervisors, contractors, and sub-contractors.	OHS Training Procedure.	360 days after the Closing Date.
2.3.4	Implement the ESMS Procedures and the Corrective Action Plan described in point 2.3.2.	Evidence of implementation.	As part of the ESCR.
2.4	Reference: Workers Engaged by Third Parties		
2.4.1	Develop a procedure within the ESMS to ensure that contractors and service providers: (i) respect the legal labor rights of employees in terms of wages, working hours, overtime; (ii) transparently provide information to employees on the composition of their wages, and pay wages on time; (iii) provide adequate, good quality PPE and ensure its use; (iv) regularly train employees in OHS, including work at heights; (v) adopt protocols that prevent COVID-19 infections; and (vi) refuse to hire minors.	ESMS Contractor Management Procedure.	180 days after the Closing Date.
2.4.2	Implement the Contractor Management Procedure.	Evidence of implementation.	As part of the ESCR.
2.4.3	Develop a procedure within the ESMS to provide and maintain housing for employees.	Procedure for the provision and maintenance of housing for workers.	360 days after the Closing Date.
2.4.5	Standardize the basic medical equipment at medical facilities, including medical kits, medical oxygen availability, and minimum indispensable medical instruments, as determined by a medical professional specialized in handling emergencies and as required by national legislation.	List of Basic Medical Equipment.	180 days after the Closing Date.
PS 3: Resource Efficiency and Pollution Prevention			
3.1	Pollution Prevention		
3.1.1	Develop a procedure to regularly monitor PM _{2.5} and PM ₁₀ particulates and ensure that their concentrations at workplaces are within the limits established by local legislation and international good practices.	Air quality Monitoring and Management Procedure.	180 days after the Closing Date.
3.2	Waste		
3.2.1	Develop a corporate procedure for solid waste management that includes collection, classification, segregation, and disposal.	Waste Management Procedure.	180 days after the Closing Date.
3.2.2	Implement the Waste Management Procedure.	Evidence of implementation.	As part of the ESCR.
3.3	Effluents		
3.3.1	Develop an effluents management procedure that includes temporary administration of Wastewater Treatment Plants (WWTP), effluent quality analysis, and the suitability of treated water for irrigation.	Effluents Management Plan.	180 days after the Closing Date.
3.3.2	Implement the Effluents Management Plan.	Evidence of implementation.	As part of the ESCR.
3.4	Hazardous Materials Management		
3.4.1	Develop a hazardous waste management procedure that is compatible with national legislation and global Environmental, Health and Safety General Guidelines.	Hazardous Waste Management Procedure.	270 days after the Closing Date.
3.4.2	Implement the Waste Management Procedure.	Evidence of implementation.	As part of the ESCR.
3.5	Pesticide Use and Management		
3.5.1	Eliminate the use of the WHO class 1a and 1b pesticides for pest control.	Evidence of implementation.	As part of the ESCR.

PS 4: Community Health, Safety, and Security			
4.1	Community Health and Safety		
4.1.1	Include procedures for managing the influx of workers to projects in the generic terms of reference for the preparation of ESIA's.	Generic terms of reference for the ESIA.	As part of the ESCR.
PS 5: Land Acquisition and Involuntary Resettlement			
5.1	Land Acquisition and Involuntary Resettlement		
5.1.1	Develop a procedure to ensure that land acquisition for new ventures does not result in physical or economic resettlement for local residents.	Land Acquisition Procedure.	360 days after the Closing Date.
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources			
6.1	Biodiversity Conservation and Sustainable Management of Living Natural Resources		
6.1.1	Develop a corporate procedure that regulates the recovery of plant and animal biodiversity.	Procedure to recover plant and animal biodiversity.	360 days after the Closing Date.
PS 8: Cultural Heritage			
8.1	Cultural Heritage		
8.1.1	Develop a procedure for mandatory monitoring of chance finds by contractors and subcontractors.	Chance Finds Procedure.	270 days after the Closing Date.