

**RUBA INMOBILIARIA – MEXICO**  
**Environmental and Social Action Plan (ESAP)**

No.	Action	Deliverable	Delivery date
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>			
1.1	Reference: Policy		
1.1.1	Develop an environmental, social, and occupational health and safety policy that specifies: (i) the person in the organization who will ensure its enforcement and will be responsible for its execution and for obtaining the necessary resources for its implementation; (ii) how the policy will be notified; (iii) the mechanism to measure and communicate continuous improvement, for its implementation; and (v) its date of entry into force.	Sustainability Policy	30 days after the first disbursement.
1.1.2	Notify the Sustainability Policy to all Company employees, including contractors and temporary workers, as well as to other external stakeholders.	Evidence of Communication..	60 days after the first disbursement.
1.2	Reference: Identification of Risks and Impacts.		
1.2.1	Develop a corporate procedure to identify, characterize, and evaluate the environmental and social (E&S), occupational health and safety (OHS), and community health, safety, and security risks and impacts generated in its projects, to include: i) the standard terms of reference to perform environmental and social impact studies (ESIS) of the new developments; ii) the requirement to prepare a base matrix of E&S and OHS risks and impacts, for each new development; iii) a general analysis of climate change risks and cumulative impacts on the new developments; and iv) guidelines for monitoring and evaluation of risk management activities.	Procedure for the identification of Risk and Impacts.	120 days after the first disbursement.
1.2.2	Develop a corporate procedure to identify, characterize and evaluate E&S risks and impacts in the Company's supply chain.	Procedure to Identify Supply Chain Risks and Impacts.	60 days after the first disbursement.
1.2.3	Implement the Risk and Impact Identification Procedure.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
1.2.4	Implement the Supply Chain Risk and Impact Identification Procedure.	Evidence of implementation.	As part of the ESCR.
1.3	Reference: Management Programs		
1.3.1	Develop a corporate procedure for the Integrated Management of Solid and Liquid Waste compatible with national legislation and the World Bank's General Environmental, Health, and Safety (EHS) Guidelines.	Procedure for the Management of Waste.	180 days after the first disbursement.
1.3.2	Develop a corporate procedure for Air Quality Management (e.g. air emissions of any kind, particulate matter, ambient noise) compatible with national legislation and the World Bank's EHS General Guidelines.	Procedure for the Management of Air Quality.	180 days after the first disbursement.
1.3.3	Develop a corporate procedure for Hazardous Materials Management compatible with national legislation and the World Bank's EHS General Guidelines.	Procedure for the Management of Hazardous Materials.	180 days after the first disbursement.
1.3.4	Develop a procedure for the provision and maintenance of lodging for workers.	Procedure for the provision and maintenance of lodging for workers.	180 days after the first disbursement.
1.3.5	Develop a procedure to ensure that contractors and service providers: i) respect workers' legal labor rights with regard to wage payment, control of working hours, overtime; ii) adopt the Company's environmental, social, and OHS Management Programs.	Procedure for Contractor and Supplier Management.	180 days after the first disbursement.
1.3.6	Develop a road safety procedure that includes road emergency preparedness and response that include emergency assistance for drivers and third parties in the event of contingencies.	Transport Management Procedure.	120 days after the first disbursement.
1.3.7	Implement the following procedures: i) Integrated Solid and Liquid Waste Management; ii) Air Quality Management; iii) Hazardous Materials Management; iv) Provision and Maintenance of Worker Lodging; v) Contractor and Service Provider Management; and vi) Road Safety.	Evidence of implementation.	As part of the ESCR.
1.4	Reference: Organizational Capacity and Competency		
1.4.1	Appoint a person responsible to manage the Company's External Grievance Mechanism.	Terms of Reference of the Position and copy of the appointment.	30 days after the first disbursement.

1.4.2	Appoint a person responsible to manage at the corporate level the projects developed by the Company.	Terms of Reference of the Position and copy of the appointment.	30 days after the first disbursement.
1.4.3	Appoint a person responsible to manage at the corporate level OHS risks.	Terms of Reference of the Position and copy of the appointment.	30 days after the first disbursement.
1.4.4	Appoint a person responsible to manage environmental and social risks in the Company's supply chain.	Terms of Reference of the Position and copy of the appointment.	30 days after the first disbursement.
1.5	Reference: Emergency Preparedness and Response		
1.5.1	Produce a framework to prepare the Emergency Preparedness and Response Plan (EPRP) to be developed and implemented by each new project, which will identify all possible emergency situations and how to proceed, should they happen.	Framework to prepare the EPRP	180 days after the first disbursement.
1.5.2	Implement the EPRP Procedure for each of the projects executed by the Company.	Evidence of implementation.	As part of the ESCR.
1.6	Reference: Monitoring and Review		
1.6.1	Develop a procedure to monitor and evaluate the implementation of the Company's Environmental and Social Management System, to include: i) a compliance matrix with key performance indicators (KPIs); and ii) internal or external audit procedures that allow for evaluating the compliance status with the Company's management policies and programs.	Monitoring and Control Procedure.	240 days after the first disbursement.
1.6.2	Implement the Monitoring and Control Procedure.	Evidence of implementation.	As part of the ESCR.
1.7	Reference: Stakeholder Engagement		
1.7.1	Develop a stakeholder participation framework outlining the general principles and a specific strategy to identify the affected communities and other relevant stakeholders and that plans a participation process for each new project to be developed by the Company.	Stakeholder Participation Plan.	180 days after the first disbursement.
1.7.3	Implement the Stakeholder Participation Plan.	Evidence of implementation.	As part of the ESCR.
1.8	Reference: External Communication and Grievance Mechanisms		
1.8.1	Develop a grievance mechanism through which communities can consult, express concerns, or file complaints, to include: i) methods for capturing grievances and complaints (telephone number, website, and email address); ii) maximum response time to process complaints; iii) the designation of an employee or team to receive, register, validate, investigate, and determine solution alternatives for external public communications; and iv) guidelines to monitor, document, and communicate responses to the complainants.	External Grievance Mechanism.	120 days after the first disbursement.
1.8.2	Implement the External Grievance Mechanism.	Evidence of implementation.	As part of the ESCR.
<b>PS 2: Labor and Working Conditions</b>			
2.1	Reference: Human Resources Policies and Procedures		
2.1.1	Update the Human Resources Policy to include explicit references to: i) recognition of workers' labor rights as required by local labor laws and international standards; ii) gender equality, non-discrimination and equal opportunity; iii) freedom of association and recognition of the right to collective bargaining; iv) workers' right to file complaints without fear of reprisals; v) rejection of child labor and forced labor; and vi) healthy workplace.	Updated Human Resources Policy.	60 days after the first disbursement.
2.1.2	Communicate the Human Resources Policy to all Company staff.	Evidence of Communication.	As part of the ESCR.
2.2	Reference: Grievance Mechanism		
2.2.1	Develop a procedure to create and manage an internal grievance mechanism through which direct and indirect workers may consult, express concerns, or file complaints, to include: i) methods for capturing grievances and complaints (telephone number, website, and email address); ii) maximum response time to process complaints; iii) the designation of an employee or team to receive, register, validate, investigate, and determine solution alternatives for complaints; and iv) guidelines to monitor, document, and communicate responses to the complainants.	Internal Grievance Mechanism.	120 days after the first disbursement.
2.2.2	Implement the Grievance Mechanism.	Evidence of implementation.	As part of the ESCR.

2.3	Reference: Occupational Health and Safety		
2.3.2	Hire an External Consultant to conduct a gap analysis of the Company's OHS management system, using international standards (e.g., ISO 45001, OSHA) as a benchmark ("Gap Analysis").	Terms of Reference and Order to Proceed with hiring the Gap Analysis.	As a condition precedent of the first disbursement.
2.3.2	Submit the Gap Analysis along with a corrective plan and its implementation schedule (the "Corrective Action Plan"), to prioritize ESMS procedures that must be developed or updated in critical areas to prevent common accidents.	Gap Analysis and Corrective Action Plan.	180 days after the first disbursement.
2.3.3	Develop OHS procedures, manuals, and instructions as described in the Corrective Action Plan.	OHS Procedure.	As per the dates defined in the Corrective Action Plan.
2.3.4	Implement the OHS Procedures.	Evidence of implementation.	As part of the ESCR.
<b>PS 5: Land Acquisition and Involuntary Resettlement</b>			
5.1	Reference: Land Acquisition and Involuntary Resettlement		
5.1.1	Develop a corporate procedure so that land acquisition for new enterprises does not produce physical or economic displacement of the population.	Land Acquisition Procedure.	360 days after the first disbursement.
<b>PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>			
6.1	Reference: Biodiversity Conservation and Sustainable Management of Living Natural Resources		
6.1.1	Develop a corporate procedure (mandatory for contractors and subcontractors) to protect plant and animal biodiversity in places where Ruba real estate projects will be developed.	Procedure to protect plant and animal biodiversity.	360 days after the first disbursement.
<b>PS 8: Cultural Heritage</b>			
8.1	Reference: Cultural Heritage		
8.1.1	Develop a corporate procedure (mandatory for contractors and subcontractors) to manage chance finds.	Chance Find Procedure.	270 days after the first disbursement.