

METROTEL – Argentina

Environmental and Social Action Plan (ESAP)

October 2022

No.	Aspect	Action	Deliverable	Delivery date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Integrated Management System	Design and implement an Integrated Environmental, Social, and Health and Safety Management System (IMS). The structure and goals of the IMS will be in line with the requirements of IFC Performance Standard 1; the system's programs, plans and procedures will meet the requirements of the legislation in force, those of the enforcement authorities, and those of the applicable IFC guidelines.	Demonstrate documented commitment to design and implement the IMS.	Prior to the second disbursement.
1.2	Environmental, Social, and Health and Safety Management Division	Create the Environmental, Social, and Health and Safety Management Division of the IMS. Appoint a Metrotel staff member to lead the implementation and update of the IMS.	<ol style="list-style-type: none"> 1. Creation of the Health, Safety, Social, and Environmental Management Division. 2. Appointment of the IMS lead. 	2 months after the second disbursement.
1.3	Project Environmental, Social, and Health and Safety Policy	Develop a Health, Safety, Social, and Environmental Management Policy for Metrotel, consistent with the principles of IDB Invest's Environmental and Social Sustainability Policy.	<ol style="list-style-type: none"> 1. Develop a Health, Safety, Social, and Environmental Management Policy. 2. Evidence of incorporation into the IMS. 	<ol style="list-style-type: none"> 1. 3 months after the second disbursement. 2. 6 months after the second disbursement.
1.4	Environmental, Social, Health and Safety Management Program	Through a Health, Safety, Social, and Environmental Management Program, set annual goals and target values for certain key parameters and indicators, as well as the actions, responsibilities, and deadlines for achieving these goals and target values.	<ol style="list-style-type: none"> 1. Preparation of the Program. 2. Evidence of implementation. 	<ol style="list-style-type: none"> 1. 3 months after the second disbursement. 2. 6 months after the second disbursement.
1.5	Identification of environmental and social aspects, occupational risks, and legal aspects	Develop independently, and incorporate into the IMS, the following matrices: 1. Matrix for the identification and evaluation of environmental and social aspects; 2. Matrix for the identification and evaluation of occupational risks; 3. Matrix for the identification and evaluation of legal aspects.	<ol style="list-style-type: none"> 1. Matrix for the identification and evaluation of environmental and social aspects. 2. Matrix for the identification and evaluation of occupational risks. 3. Matrix for the identification and evaluation of legal aspects. 	2 months after the second disbursement
1.6	Management Procedures	Develop and include as part of the IMS, operational procedures to comply with the environmental, social, and occupational health requirements of Argentinean legislation and the loan agreement.	<ol style="list-style-type: none"> 1. IMS Operating Procedures 	<ol style="list-style-type: none"> 1. 4 months after the second disbursement.

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			2. Evidence of implementation.	2. 8 months after the second disbursement.
1.7	Training	As part of the IMS, prepare and implement a semi-annual or annual Environmental, Social, and Health and Safety Training Plan. The Plan must include, at least electrical safety, electromagnetic fields, safety in the use of fiber optics, work at heights, confined space entry, and vehicle driving. The Training Plan must include, if necessary, the training of contracted personnel.	1. First Semi-Annual Training Plan. 2. Evidence of implementation.	1. 2 months after the second disbursement. 2. 4 months after the second disbursement.
1.8	Documentation management	Prepare and implement a documentation management procedure to prepare, approve, distribute, conserve, control, and update all IMS documents.	1. Documentation management procedure. 2. Evidence of implementation.	3. 3 months after the second disbursement. 1. 6 months after the second disbursement.
1.9	Emergency Management	Develop and implement, for each site (administrative, operational, or warehouse) a specific Emergency Prevention and Response Plan, based on common methodological guidelines, but including site-specific emergency scenarios.	1. Emergency Prevention and Response Plan. 2. Evidence of implementation.	1. 3 months after the second disbursement. 2. 6 months after the second disbursement.
		For each administrative headquarters or operational unit that has been the subject of an Emergency Prevention and Response Plan, carry out an emergency drill at least once a year.	Drill reports.	In each Environmental and Social Compliance Report.
1.10	Accident Management	Develop and implement a specific Accident Management procedure applicable to in-house personnel and those engaged by third parties, whose contents ensure compliance with legal requirements. The procedure must include the assignment of responsibilities for at least the following: i) actions to be performed immediately after an accident; ii) instructions and formats for recording the nature and seriousness of the accident; iii) instructions and records for complying with legal aspects; iv) instructions and formats for preparing the accident investigation report, including the identification of preventive or corrective measures adopted to avoid its recurrence	1. Accident Management Procedure. 2. Evidence of implementation.	1. 3 months after the second disbursement. 2. 6 months after the second disbursement.
1.11	Goods and Services Supplier Management	Develop and implement a Goods and Services Supplier Regulation; such regulation must include aspects specific to the nature and scope of each supplier's activities. The following aspects must be considered at the time of preparing each Regulation: (i) environmental and health and safety requirements for the purchase of products or services; (ii) the obligation, on the part of each supplier, to comply with all legal aspects and with those aspects of the Performance Standards that would be relevant to its activities; (iii) list of IMS programs, plans, and procedures applicable to the specific activity of each supplier; (iv) minimum requirements to be met by suppliers in terms of training, qualification, and safety equipment for the provision of goods or services; (v)	1. Goods and Services Supplier Regulation. 2. Evidence of implementation.	1. 4 months after the second disbursement. 2. 6 months after the second disbursement.

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		<p>channels and mechanism for receiving and resolving grievances and complaints from each supplier's own and subcontracted personnel.</p> <p>For suppliers with contracts in force prior to the loan agreement, Metrotel will provide a copy of the Goods and Services Supplier Regulation and will require a written commitment to comply with them from each supplier. For new contracts, the Regulation must be an exhibit to each contract. In both cases, the Regulation must be binding.</p>		
1.12	Environmental, Social, and Health and Safety Monitoring	<p>Develop and implement a Health, Safety, Social, and Environmental Monitoring Plan to monitor, at least, the following parameters: i) those required in the respective authorizations for administrative premises and warehouses; ii) occupational noise levels (frequency at the discretion of the acting professional); iii) lighting (frequency as above); iv) ground resistance (frequency as above); v) accident Frequency Index and Severity Index for own personnel and for contracted personnel (monthly); vi) records of incidents or near misses; vii) records of occupational disease management and COVID-19 cases (monthly); viii) number of labor claims received and resolved (monthly); ix) number of community claims received and resolved (monthly); x) amount of water, energy and supplies consumed (could include paper consumption, printer toner, etc.) and waste generated (monthly); and xi) schedule and number of training courses given (monthly). Threshold values for the parameters measured must be the legal values or those of the applicable IFC guidelines (whichever is more stringent).¹ ii) Whenever the measured values exceed the regulatory thresholds or the corresponding IFC guidelines, the Company must present the corrective measures to be adopted to avoid their recurrence.</p>	<ol style="list-style-type: none"> 1. Health, Safety, Social, and Environmental Monitoring Plan. 2. Evidence of implementation. 	<ol style="list-style-type: none"> 1. 3 months after the second disbursement. 2. 6 months after the second disbursement.
1.13	Review and corrective action	<p>Develop forms for the Health, Safety, Social, and Environmental supervision of administrative facilities, warehouses, and work fronts on public roads, to record the results and to implement and follow up on the corresponding preventive/corrective measures.</p>	<ol style="list-style-type: none"> 1. Supervision forms and preventive/corrective action implementation and follow-up forms 2. Evidence of adoption. 	<ol style="list-style-type: none"> 1. 3 months after the second disbursement. 2. 6 months after the second disbursement.
1.14	Third-party grievance reception and resolution	<p>Develop and implement a mechanism for receiving and resolving third-party grievances, including the possibility of capturing complaints or grievances anonymously. The mechanism will clearly set out the assignment of responsibilities and the deadlines for evaluating and responding to the submissions made.</p>	<ol style="list-style-type: none"> 1. Mechanism for receiving and resolving grievances. 2. Evidence of implementation. 	<ol style="list-style-type: none"> 1. 3 months after the second disbursement. 2. 6 months after the second disbursement.

¹ Reference values for specific parameters are given in the IFC General EHS Guidelines.

<https://www.ifc.org/wps/wcm/connect/eb6fddc1-a3e3-4be5-a3da-bc3e0e919b6e/General%2BEHS%2B-%2Bspanish%2B-%2BFinal%2Brev%2Bcc.pdf?MOD=AJPERES&CVID=nPtqG11>

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PS 2: Labor and Working Conditions				
2.1	Human Resources Policies	Develop and implement a Human Resources Policy for the Project, applicable to own personnel and workers engaged by third parties.	<ol style="list-style-type: none"> Human Resources Policy for the Project. Evidence of implementation. 	<ol style="list-style-type: none"> 4 months after the second disbursement. 6 months after the second disbursement.
2.2	Women's participation	Promote and monitor women's participation in the workforce.	Report on women's participation in the workforce.	In each Environmental and Social Compliance Report.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Resource Efficiency	Generate records on monthly consumption of water and electricity, fuel for vehicles, and the amount and destination of waste generated or recycled. Establish and implement the necessary actions to comply with the targets and goals proposed in the Environmental, Social, and Health and Safety Management Program.	Records of consumption and waste recycled	In each Environmental and Social Compliance Report.
3.2	Greenhouse Gases	<ol style="list-style-type: none"> Submit GHG estimates for the following year. Submit the calculation of the previous year's emissions. 	<ol style="list-style-type: none"> GHG emission estimates for the following year. Calculation of the previous year's GHG emissions. 	In each Environmental and Social Compliance Report.
3.3	Waste Management	Develop and implement a waste management procedure that includes record formats to quantify and record the amount and type of waste generated in administrative facilities, warehouses, and production facilities.	<ol style="list-style-type: none"> Waste Management Procedure. Evidence of implementation. 	<ol style="list-style-type: none"> 3 months after the second disbursement. 6 months after the second disbursement.
3.4	Hazardous substances management	Develop and implement a procedure for the management (purchase, transport, storage, and handling) of hazardous substances that includes the express prohibition of the purchase and use of pesticides or chemical substances that include any Class Ia (extremely hazardous) or Ib (highly hazardous) component according to the WHO classification.	<ol style="list-style-type: none"> Hazardous substances management Procedure. Evidence of implementation. 	<ol style="list-style-type: none"> 3 months after the second disbursement. 6 months after the second disbursement.
PS 4: Community Health, Safety, and Security				
4.1		1. Develop a stakeholder mapping and Stakeholder Engagement Plan, to include stakeholders near administrative facilities, warehouses, and work fronts on public roads. Fulfill the requirements of PS4, including differentiated measures to enable effective community and neighbor	<ol style="list-style-type: none"> Stakeholder mapping and Stakeholder Engagement Plan. Evidence of implementation. 	1. 4 months after the second disbursement.

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		<p>participation and a method for sharing information with identified stakeholders.</p> <p>2. Implement the Stakeholder Relationship Plan.</p>		<p>2. 6 months after the second disbursement.</p>