

**ITULPARK – ECUADOR**  
**Environmental and Social Action Plan (ESAP)**

No.	Aspect	Action	Deliverable	Delivery date
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>				
1.1	Environmental and Social Management	1. Update the Environmental and Social Management System (“ESMS”) for the construction phase to include: i) policies; ii) risk and impact identification protocols; iii) management programs; iv) organizational capacity and competency requirements; v) emergency preparedness and response protocols; vi) stakeholder engagement procedures; vii) external communications protocols and grievance mechanisms; viii) requirements of periodic reports to affected communities; and ix) monitoring and review protocols.	1. ESMS Manuals for the construction phase.	1. 30 days after signing the loan agreement.
		2. Implement the ESMS for the construction phase.	2. Evidence of implementation.	2. As part of the Environmental and Social Compliance Report (ESCR).
		3. Develop an ESMS for the operation phase with similar characteristics to the one used in the ESMS for the construction phase.	3. ESMS Manual for the operation phase.	3. Prior to Financial Closure.
		4. Implement the ESMS for the operation phase.	4. Evidence of implementation.	4. As part of the ESCR.
1.2	Policy	1. Update the Occupational Health, Safety, and Environment Policies for the construction phase, including the Project’s commitment to the safety and health of the neighboring communities.	1. Occupational Health, Safety, and Environment Policy updated.	1. 15 days after the start of construction.
		2. Disseminate the updates, Policy.	2. Evidence of dissemination.	2. As part of the ESCR.
		3. Develop, for the operation phase, an environmental, OHS, and community health and safety policies.	3. Environmental, OHS, and community health and safety policy(ies).	3. Prior to Financial Closure.
		4. Disseminate the policies.	4. Evidence of dissemination.	4. As part of the ESCR.
1.3	Identification of Risks and Impacts	1. Obtain the permission of the Fire Department prior to the start of operations of the logistics park.	1. Fire Department’s permit.	1. Prior to First Disbursement.
		2. Develop, for the construction phase, a procedure to identify and assess the risks and impacts on the community.	3. Community risk and impact identification and assessment procedure.	2. Prior to First Disbursement.
		4. Implement the procedure for identifying and evaluating risks and impacts on the community for the construction phase.	5. Community risk and impact identification and assessment matrix.	3. As part of the ESCR.
		4. Develop, for the operation phase, environmental, social, and occupational health and safety (“OHS”) hazard identification and risk assessment (“HIRA”) matrices including management measures for such risks.	5. HIRA matrices for the operation phase.	4. Prior to Financial Closure.
	Gender Risks	6. Implement the HIRA matrices for the operation phase.	6. Evidence of implementation.	5. As part of the ESCR.
		1. Develop, for all phases of the Project, a policy applicable to all its employees, as well as those of contractors and subcontractors) that prohibits: i) gender-based violence and harassment; ii) discrimination; and iii) sexual harassment.	1. Copy of the Policy.	1. 60 days after signing the loan agreement.
2. Disseminate the policy to all its employees, as well as those of contractors and subcontractors.	2. Evidence of dissemination.	2. As part of the ESCR.		
1.4	Management Programs	1. Develop management programs to implement the EMP during the Project’s operation phase.	1. Management programs for the operation phase.	1. Prior to Financial Closure.
		2. Implement the management programs for the operation phase.	2. Evidence of implementation.	2. As part of the ESCR.
1.5	Emergency Preparedness and Response	1. Update the Emergency Plan for the construction phase of the Project to include, among others: i) management measures for the effects of weather events; and ii) protocols for identifying risks affecting the Company’s assets and supply chain.	1. Updated Emergency Plan.	1. Prior to Financial Closure.
		2. Implement the updated Emergency Plan.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Develop, for the operation phase of the Project, an Emergency Plan to include: i) administrative and operational actions to control and mitigate potential harm to direct	3. Emergency Plan for the operation phase.	3. Prior to Financial Closure.

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		and indirect workers, communities within the project's ADI, the environment, and infrastructure; and ii) risk scenarios with higher probability of occurrence (natural disasters and climate change).		
		4. Implement the Emergency Plan for the operation phase.	4. Evidence of implementation.	4. As part of the ESCR.
1.6	Monitoring and review	1. Prepare for the construction phase a compliance matrix for all legal and contractual obligations, to include, among other aspects: i) the control organism that issues the permit or license; ii) the dates of issuance and validity; and iii) the internal persons responsible for monitoring renewals.	1. Legal and contractual compliance matrix.	1. 15 days after the signing of the loan agreement
		2. Periodically update the E&S licenses and permits matrix for the execution of the Project.	2. E&S licenses and permits matrix updated.	2. As part of the ESCR.
		3. Develop procedures to evaluate the ESMS for the Project's operation phase, using key performance indicators (KPIs).	3. ESMS performance evaluation procedures for the operation phase.	3. Prior to Financial Closure.
		4. Implement the ESMS performance evaluation procedures for the operation phase.	4. Evidence of implementation.	4. As part of the ESCR.
		5. Keep the legal and contractual obligations compliance matrix up to date.	5. Legal and contractual compliance matrix updated.	5. As part of the ESCR.
1.7	Stakeholder Engagement	1. Develop a Project Stakeholder Engagement Plan ("SEP") that includes: i) stakeholder identification and mapping; and ii) future stakeholder engagement activities, including social investment programs.	1. Stakeholder Engagement Plan.	1. 60 days after signing the loan agreement.
		2. Implement the SEP.	2. Evidence of implementation of the SEP.	2. As part of the ESCR.
1.8	Community Grievance Mechanism	1. Develop a Grievance Mechanism for Communities and stakeholders to include: i) a detail of the channels for capturing complaints; ii) a description of the documentation system for recording, tracking, analyzing, and resolving complaints; iii) details of response times and records; iv) a description of the mechanisms for communication and dissemination of complaints filed and processed; v) a detail of how the mechanism will be disclosed to the area of influence communities and relevant stakeholders; and vi) a protocol to be followed to address cases of gender-based violence.	1. External Grievance Mechanism.	1. 15 days after the signing of the loan agreement.
		2. Disseminate the grievance mechanism to communities and stakeholders.	2. Evidence of dissemination.	2. 30 days after the signing of the credit agreement.
		3. Implement the grievance mechanism to communities and stakeholders.	3. Community grievances report (in matrix form).	3. As part of the ESCR.
1.9	Ongoing Reporting to Affected Communities	1. Provide information on i) the environmental and social performance of the Project; ii) the answers to the material complaints that have been submitted; y iii) the overall functioning of the external grievance mechanism.	1. Evidence of disclosure.	1. As part of the ESCR.
<b>PS 2: Labor and Working Conditions</b>				
2.1	Working Conditions	1. Develop internal labor regulations for Company employees during the operation phase, including provisions for contractors, suppliers, and visitors.	1. Internal Labor Regulations for the Project.	1. 30 days after signing the loan agreement.
		2. Disclosure of the Internal Labor Regulations.	2. Evidence of disclosure.	2. 60 days after signing the loan agreement.
2.2	Employee grievance mechanism	1. Develop an internal grievance mechanism applicable to all phases of the Project, open to all Project workers, including contractors, to include: i) details of the channels for receiving complaints; ii) a description of the documentation system for recording, tracking, and analyzing complaints and solutions; iii) details of defined timeframes and response records; iv) a description of the mechanisms for communication and dissemination of complaints filed; v) the ability to capture complaints of harassment or gender-based violence; vi) the ability to respect the anonymity of the complainant; and vii) zero tolerance for retaliation against those who file a complaint.	1. Internal Grievance Mechanism.	1. Prior to First Disbursement.
		2. Disseminate the Internal Grievance Mechanism to internal workers, contractors, and subcontractors.	2. Evidence of dissemination.	2. 30 days after the first disbursement.
		3. Implement the Internal Grievance Mechanism.	3. Employee Grievance Report (in matrix form).	3. As part of the ESCR.

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2.3	Occupational Health and Safety	1. Provide, during the construction phase, an appropriate place for workers to rest.	1. Adequacy of rest area for construction workers.	1. 30 days after the first disbursement.
		2. Perform, during the construction phase, occupational hygiene measurements required according to the HIREC matrices.	2. Evidence of implementation.	2. As part of the ESCR.
		3. For the operation phase, develop Occupational Health and Safety Internal Regulations (OHSIR) applicable to the Project.	3. Occupational Health and Safety Internal Regulations.	3. According to the existing number of workers as required by law.
		4. Perform, during the operation phase, take occupational hygiene measurements required according to the HIREC matrices.	4. Evidence of implementation.	4. As part of the ESCR.
		5. Develop, for the operation phase, a Health Surveillance Plan for workers.	5. Health Surveillance Plan.	5. Prior to Financial Closure.
		6. Implement the Health Surveillance Plan for the operation phase.	6. Evidence of implementation.	6. As part of the ESCR.
2.4	Provisions for People with Disabilities	1. Define specific provisions for the operation phase of the Project to ensure the full development of workers with disabilities.	1. Specific provisions for workers with disabilities.	1. 30 days after signing the loan agreement.
<b>PS 3: Resource Efficiency and Pollution Prevention</b>				
3.1	Resource Efficiency – Greenhouse Gases	1. Conduct a greenhouse gases (GHG) emissions inventory including scope 1 and 2.	1. GHG emissions inventory.	1. One year after signing the loan agreement (baseline) and then as part of the ESCR.
3.2	Resource Efficiency – Water Consumption	1. Keep a record of the volume of water used for the construction phase.	1. Record of the volume of water for the construction phase.	1. As part of the ESCR (Record of the volume).
		2. Keep a record of the volume of water used for the operation phase.	2. Record of the volume of water for the operation phase.	2. As part of the ESCR (Record of the volume).
		3. Keep a record of the volume of treated water to be used to irrigate green areas.	3. Record of the volume of treated water.	3. As part of the ESCR (Record of the volume).
3.3	Pollution Prevention	1. Develop a procedure for the operation and maintenance of the domestic wastewater treatment plant (WWTP).	1. Procedures for the operation and maintenance of the WWTP.	1. 60 days after signing the loan agreement.
		2. Implement the procedures for the operation and maintenance of the WWTP.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Perform monitoring of the discharge water to the authorized water body.	3. Monitoring log.	3. Quarterly, as part of the ESCR.
		4. Keep a record of the volume of the treated water to be discharged into the authorized body water.	4. Record of discharge water volumes.	4. As part of the ESCR (Record of the volume).
		5. Monitor water quality upstream and downstream of the treated water discharge point for both the dry and rainy seasons.	5. Monitoring log.	5. As part of the ESCR.
		6. Develop a preventive maintenance program for equipment and machinery for the operational phase.	6. Preventive maintenance program for equipment and machinery.	6. Prior to Financial Closure.
		7. Implement the preventive maintenance program for equipment and machinery.	7. Evidence of implementation.	7. As part of the ESCR.
		8. During the operation phase, request vehicle inspection certificates, prohibition of the use of sirens, and compliance with the previously established work schedule.	8. Verification documents.	8. As part of the ESCR.
		9. Monitor hazardous, non-hazardous, and special solid waste generated and disposed of during the Project's operation phase.	9. Record of quantities of waste by type generated.	9. As part of the ESCR.
		10. Provide on-site storage sites for hazardous materials, ensuring that: i) the storage conditions comply with national regulations and accepted international standards; ii) material safety data sheets ("MSDS") always exist in these places for each product; iii) substance incompatibility information be generated; iv) spill kits are available at each storage site appropriate to the quantity or volume stored; and v) each storage site has a contingency plan in case of spills or accidents.	10. Evidence of adequacy of hazardous materials storage sites.	10. 30 days after signing the loan agreement.
		11. Develop, for the operation phase, a hazardous materials handling and storage procedure.	11. Hazardous materials handling and storage procedure.	11. Prior to Financial Closure.

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		12. Implement the hazardous materials handling procedure for the operation phase.	12. Evidence of implementation.	12. As part of the ESCR.
<b>PS 4: Community Health, Safety, and Security</b>				
4.1	Community Health and Safety	1. Develop a Road Management and Safety Plan that includes: i) control measures for potential risks associated with increased heavy vehicular traffic during construction; ii) protocols for monitoring vehicle conditions, and drivers' health conditions; iii) training requirements for drivers (defensive driving); and iv) measures to foster a culture of road safety among road users and local communities.	1. Road Management and Safety Plan for the construction phase.	1. 30 days prior to the start of construction.
		2. Implement the Road Management and Safety Plan.	2. Evidence of implementation.	2. As part of the ESCR.
4.2	Security Personnel	3. Develop a Physical Security Management Manual that includes: i) professional ethics issues; ii) a commitment to respect human rights by adhering to the United Nations Voluntary Principles ("VPs") on Security Forces and Human Rights; iii) reasonable investigation methods to ensure that security personnel do not have a criminal record and have not been involved in cases of abuse; iv) specific procedures for the use of firearms; and v) training requirements regarding the progressive use of force.	3. Physical Security Management Manual.	3. 90 days after signing the loan agreement.
		4. Implement the Physical Security Management Manual.	4. Evidence of implementation.	4. As part of the ESCR.