

**Productive Business Solutions (“PBS”) Financing – Barbados
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	Environmental and Social Management System (ESMS)	1. Update the ESMS to reflect: i) specific policies and procedures to be implemented at each office; ii) revisions to the risks impact matrix identifying potential E&S (including pollution prevention and cumulative impacts), environmental health and safety (EHS) and occupational H&S (OHS) risks and impacts, as well as associated control measures through a systematic process, and appropriate strategies; iii) management procedures to prevent, mitigate or compensate any undesired E&S impact and, EHS/OHS risks (as identified in the matrix), and fulfill requirements contained in environmental licenses; iv) an organization chart covering the relevant locations and highlighting the specific local EHS focal point with roles and responsibilities; v) a detailed E&S training matrix; vi) HR section specifying key performance indicators (KPI's) to be monitored and procedures for reporting; and vii) revised emergency preparedness and response procedures.	1. Updated ESMS Manual	1. 6 months after 1 st disbursement
		2. Implement the ESMS for each office	2. ESMS implementation report	2. As part of the ESCR
		3. Train employees on ESMS	3. Training reports	3. As part of the ESCR
		4. Establish EHS Committee	4. Evidence of EHS Committee establishment	4. 3 months after 1 st disbursement
		5. Present EHS reports	5. Copy of EHS reports	5. As part of the ESCR
1.2	Emergency Preparedness and Response (EPR)	1. Submit the relevant EPR documents for: i) Disaster Preparedness/Recovery Manual; ii) Business Continuity Plan; and iii) Contingency Plans	1. EPR documents	1. Prior to 1st disbursement
		2. Prepare a comprehensive EPR plan for the Group	2. EPR Plan	2. 6 months after 1st disbursement
		3. Train employees on EPR documents and plans	3. Training reports	3. As part of the ESCR
		4. Submit annual drill reports	4. Drill reports	4. As part of the ESCR
1.3	Stakeholder Engagement	1. As part of the ESMS, prepare a structured Stakeholder Engagement Plan (SEP) that contains: i) specified communication channels; ii) an independent process and channels for information disclosure to stakeholders considering their category, level, and type of interaction, iii) a standardized format to be used for social media communications and guidelines on centralized management; iv) a process for ongoing consultation and reporting; and v) internal and external grievance handling procedures with consideration for vulnerable groups and commitments regarding confidentiality and anonymity	1. SEP	1. 6 months after 1 st disbursement
		2. Designate the responsible personnel or department for implementing the SEP	2. Evidence of designation	2. 1 month after 1 st disbursement
1.4	External grievance mechanism	1. Update Community Policy and Procedures to include additional channels for grievance reception and processing, along with commitments regarding confidentiality and anonymity	1. Updated Community Policy and Procedures	1. 3 months after 1 st disbursement
		2. Implement external grievance mechanism	2. Grievance reports	2. As part of the ESCR
1.5	Gender Risks and Impacts	1. Prepare universal policy on sexual harassment, gender-based violence (GBV), and non-discrimination	1. Universal policy	1. 1 month after 1 st disbursement
		2. Adopt the policy	2. Evidence of adoption	2. 3 months after 1 st disbursement
		3. Conduct training on policy	3. Training reports	3. As part of the ESCR
PS 2: Labor and Working Conditions				
2.1	Human Resource Policies and Procedures	1. Prepare a policy on non-discrimination and equal opportunity	1. Policy on non-discrimination and equal opportunity	1. 3 months after 1 st disbursement

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		2. Based on a gap analysis study, prepare Group Employee Handbooks that, among other aspects, include details on: i) applicable labor regulations including OHS and applicability to third-party contractors (including sub-contractors); ii) code of ethics and conduct (inclusive of provisions against the use of child and forced labor); iii) recruitment and selection; iv) compensation and benefits including medical; v) termination and resignation; vi) working hours, leave categories (including maternity or paternity) and holidays; vii) promotion; viii) all existing policies and procedures including grievance resolution, sexual harassment, GBV, non-discrimination and equal opportunity, and EHS; ix) performance management; x) training and development; xi) collective bargaining and declaration on freedom of association; and xii) use of company property	2. Employee handbooks	2. 3 months after 1 st disbursement
		3. Disseminate employee handbooks to employees (including third-party contractors and sub-contractors)	3. Proof of dissemination	3. 6 months after 1 st disbursement
		4. Carry out training on employee handbooks	4. Training reports	4. As part of the ESCR
		5. Provide employee reports reflecting key HR KPI's (including retrenchment)	5. HR reports	5. As part of the ESCR
		6. Revise summary grievance mechanism procedure to include: i) the teams responsible for grievance reception, assessment, and response; ii) descriptions of different grievance categories and assessment procedures linked to wider operations; iii) a description of the specific channels for grievance reception; iv) timing of responses beyond formal reports; v) dissemination mechanisms; and vi) options for anonymity, and anti-reprisals policy.	6. Revised Grievance Procedure	6. 3 months after 1 st disbursement
		7. Present periodic accounts of internal grievances	7. Report on internal grievances	7. As part of the ESCR
2.2	Child and Forced Labor	1. Update procedure documents on child labor, contractors, ESMS and commercial agreements to include provisions against the use of forced labor	1. Updated procedure documents, ESMS and commercial agreements	1. 3 months after 1 st disbursement
		2. Adopt the relevant procedure documents on child labor and contractors	2. Evidence of adoption	2. 6 months after 1 st disbursement
2.3	Occupational Health and Safety	1. Update EHS procedure document to reflect: i) hazards identification for daily operations (including hazardous materials management and safety); ii) risk assessment and classification; iii) measures to manage identified risks (including waste management procedures); iv) regular monitoring of EHS indicators; v) employees safety training plan; vi) procedures for reporting accidents including root cause analysis; and vii) detailed accident investigation procedures (including applicable emergency contact information);	1. Updated EHS procedures	1. 3 months after 1 st disbursement
		2. Disseminate formalized EHS procedure document to employees and third-party contractors	2. Evidence of dissemination	2. 6 months after 1 st disbursement
		3. Submit training reports and statistics with root cause analysis for any reported accidents	3. Annual training reports and EHS statistics	3. As part of the ESCR
2.4	Provisions for people with disabilities	1. Include provisions for people with disabilities in policy on non-discrimination and equal opportunity and relevant employee handbooks	1. Provisions for people with disabilities in non-discrimination policy and employee handbook	1. 3 months after 1 st disbursement
2.5	Workers Engaged by Third Parties	1. Update the ESMS by including the mandatory contractor questionnaire	1. Updated ESMS	1. 6 months after 1 st disbursement
		2. Update contractor procedure to reflect all necessary requirements and obligations (including but not limited to, risk assessments, job safety analysis, OHS, Company code of ethics and conduct, forced labor)	2. Updated contractor procedure	2. 3 months after 1 st disbursement
		3. Communicate update to relevant third-party contractors and sub-contractors during the procurement of new services	3. Evidence of communication	3. As part of the ESCR

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2.6	Supply chain	4. Update ESMS and relevant procurement procedures to incorporate primary vendor elements regarding sustainability and proper EHS management (including forced labor) along the supply chain	4. Updated ESMS and procurement procedures	4. 6 months after 1st disbursement
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Resource efficiency	1. Submit reports on water and energy conservation initiatives	1. Reports on water and energy conservation initiatives	1. As part of the ESCR
3.2	Waste Management (including hazardous waste)	1. Based on the results of an audit, prepare an Operational Waste Management Plan (OWMP) to address all waste streams (solid, liquid, and hazardous) and that incorporates appropriate return-recycle options linked to those of primary vendors.	1. OWMP	1. 6 months after 1st disbursement
		2. Implement OWMP	2. Evidence of implementation	2. As part of the ESCR
		3. Submit the relevant local recycle agreements for the Group	3. Local recycle agreements	3. Prior to 1st disbursement
3.3	Pesticide Use and Management	1. Update Integrated Pest Management (IPM) Policy to include list of approved pesticides with steps to not purchase, store, use, or trade in products that fall in WHO Recommended Classification of Pesticides.	1. Updated IPM	1. 6 months after 1st disbursement
PS 4: Community Health, Safety, and Security				
4.1	Community Health and Safety	1. Update ESMS and EHS procedures to capture responses to other general communicable disease outside of Covid-19 (including applicable regional vector-borne diseases)	1. Updated disease response in ESMS and ESHS procedures	1. 6 months after 1st disbursement
4.2	Infrastructure and Equipment Design and Safety	1. Update ESMS to identify and categorize hazards for which drills are to be conducted according to the location of each Group office	1. Hazard categorization in ESMS	1. 6 months after 1st disbursement
		2. Implement recommendations from the annual drill reports	2. Implementation report	2. As part of the ESCR
4.3	Security Personnel	1. Submit Security Screening Assessment procedures	1. Security Screening Assessment procedures	1. Prior to 1st disbursement
		2. Submit training regarding relevant policies (e.g., code of conduct, use of drugs and alcohol in the workplace).	2. Training reports	2. As part of the ESCR