

**Grand Bahama Road Rehabilitation Working Capital Facility – BAHAMAS  
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	Assessment and Management of Environmental and Social Risk	1. Develop an Environmental Management Plan (EMP) specific to the Project (including its asphalt plant).	1. EMP specific to the Project.	1. 15 days before the order to commence construction.
		2. Implement the EMP specific to the Project.	2. Evidence of implementation.	2. As part of the Environmental and Social Compliance Report (“ESCR”).
		3. Secure approval of the Certificate of Environmental Clearance (CEC) and all outstanding permits and licenses necessary for the Project.	3. CEC and all outstanding permits and licenses for the Project.	3. 15 days before the order to commence construction.
1.2	Environmental Management System (EMS)	1. Update the Environmental and Social Management System (ESMS) to tailor it specifically for the Project.	1. ESMS manual.	1. 300 days after signing the loan agreement.
		2. Adopt the ESMS of the Project.	2. Evidence of the ESMS implementation.	2. 300 days after signing the loan agreement, and thereafter as part of the ESCR.
		3. Assess the implementation of the ESMS.	3. ESMS assessment report.	3. 120 days after implementation and thereafter as part of the ESCR.
1.3	Policy	1. Develop an Environmental Policy.	1. Environmental Policy.	1. 90 days after signing the loan agreement.
		2. Adopt the Environmental Policy.	2. Evidence of adopting the policy.	2. As part of the ESCR.
1.4	Direct and indirect impacts and risks	1. Develop project-specific environmental and social (E&S) and occupational health and safety (OHS) risk and impact matrices, for the Project construction phase, that also includes those tasks to be performed by subcontractors.	1. Project-specific E&S and OHS risk and impact matrices for the construction phase.	1. 15 days before the order to commence construction.
		2. Implement the measures contained in the risk and impact matrices for the construction phase.	2. Evidence of the implementation.	2. As part of the ESCR.
		3. Develop project-specific environmental and social (E&S) and occupational health and safety (OHS) risk and impact matrices, for the Project operational phase, that also includes those tasks to be performed by subcontractors.	3. Project-specific E&S and OHS risk and impact matrices for the operational phase.	3. 30 days before the end of the construction phase.
		4. Implement the measures contained in the risk and impact matrices for the operational phase.	4. Evidence of the implementation.	4. As part of the ESCR.
1.5	Climate change exposure	1. Prepare a Project-specific Hurricane Response Plan that includes pre-hurricane and post-hurricane safety precaution measures.	1. Project-specific Hurricane Response Plan.	1. 90 days after signing the loan agreement.
		2. Implement the Project-specific Hurricane Plan.	2. Evidence of the implementation.	2. As part of the ESCR.

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1.6	Management Programs	1. Develop a detailed project-specific Management Program with operating controls and measures to eliminate, transfer or mitigate each significant risk or impact that includes: (i) preventive controls, focused on eliminating or reducing the frequency, probability and severity of the negative impacts or risks, supported by preventive and predictive maintenance programs for equipment and machinery, as well as by ongoing training programs for employees and drill programs; and (ii) technical and operating recommendations, which are based on the national OHS and environmental regulations.	1. Detailed Project-specific Management Program.	1. 90 days after signing the loan agreement.
		2. Implement the detailed Project-specific Management Program.	2. Evidence of the implementation.	2. As part of the ESCR.
1.7	Organizational capacity and competency	1. Designate an Environmental Manager.	1. Copy of the designation.	1. 90 days after signing the loan agreement.
1.8	Emergency preparedness and response	1. Develop a Project-specific Emergency Preparedness Plan, that includes: (i) climate risk analysis and response procedures; (ii) requirements for the conformation of response brigades; (iii) a list of contacts and communication systems and protocols; (iv) procedures to engage with the local and regional authorities <sup>1</sup> for health and emergency issues; (v) a list and the locations of the permanent emergency equipment and facilities to attend these natural hazards; (vi) diagrams of evacuation routes and meeting points; (vii) a description and a calendar for training exercises and drills including external stakeholders (for example, neighboring communities and facilities, among others); (viii) annual training programs; (ix) procedures for performing root cause analyses protocols for any major accident or fatality; and (x) a description of the corrective actions required to minimize the risk of new occurrences.	1. Project-specific Emergency Preparedness Plan.	1. 120 days after signing the loan agreement.
		2. Implement the Project-specific Emergency Preparedness Plan.	2. Evidence of the implementation.	2. As part of the ESCR.
		3. Prepare a Project-specific Environmental Contingency Plan, that contains environmental emergency response and restoration guidelines for any spill or accidental release of a pollutant, hazardous substances that may pose a threat to human health of the environment.	3. Project-specific Environmental Contingency Plan.	3. 120 days after signing the loan agreement.
		4. Implement the Project-specific ECP.	4. Evidence of the implementation.	4. As part of the ESCR.
1.9	Monitoring and review	1. Develop a Project-specific Monitoring Plan that includes: (i) a schedule for field monitoring and inspection, describing the frequencies, timing, and list of the environmental parameters to be surveyed; (ii) the location of monitoring sites; (iii) a description of the methods for data collection; (iv) analytical service requirements; (v) data management and evaluation	1. Project-specific Monitoring Plan.	1. 120 days after signing the loan agreement.

<sup>1</sup> Department of Meteorology Office; the National Emergency Management Agency (“NEMA”); and the Royal Bahamas Police Force.

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		procedures; (vi) monitoring programs for the subdivision works; and (vii) the inclusion in the reports of a summary of major findings.		
		2. Implement the Project-specific Monitoring Plan.	2. Evidence of the implementation.	2. As part of the ESCR.
1.10	Stakeholder engagement	1. Implement the Stakeholder Engagement Plan.	1. Evidence of the implementation.	1. As part of the ESCR.
1.11	Communities Grievance Mechanism	1. Provide statistics of the grievances received and processed by the External Grievance Mechanism.	1. Statistics of the grievances.	1. As part of the ESCR.
<b>PS 2: Labor and Working Conditions</b>				
2.1	Human resources policies and procedures	1. Develop an Umbrella Human Resources Policy that contains provisions for Project workers, suppliers and contractors.	1. Umbrella Human Resources Policy.	1. 120 days after signing the loan agreement.
		2. Adopt the Umbrella Human Resources Policy	2. Evidence of adoption.	2. As part of the ESCR.
		3. Disseminate the Umbrella Human Resources Policy	3. Evidence of dissemination	3. As part of the ESCR.
2.2	Working conditions and terms of employment	1. Develop an Internal Labor Rulebook (ILR) that sets rules and conditions related to: the nature of the work; methods and conditions for personnel recruitment and hiring; onboarding, suspension and dismissal of workers; working days and hours, breaks and holidays; punctuality, leaves and absences; flexible work schemes to promote collaboration and productivity; salary; supplies, tools, materials and equipment (including personal protective equipment – PPE); training; safety, health and environmental measures; professional risks; the Company's obligations and prohibitions; workers' rights and obligations; workers' prohibitions; punctuality, attendance and leave non-compliance; and sanctions.	1. Internal Labor Rulebook.	1. 120 days after signing the loan agreement.
		2. Implement the ILR	2. Evidence of the implementation.	2. As part of the ESCR.
2.3	Grievance mechanism	1. Develop an Internal Grievance Mechanism (IGM) that (i) integrates various forms to capture worker grievances and claims through additional channels (email, the website, the employee portal or the dedicated phone line) to those already in place; (ii) ensures anonymity (when requested) and confidentiality; (iii) prohibits any retaliation against those who use it; and (iv) should any labor-related investigation be initiated by the relevant authorities, provide them with information about the case.	1. Internal Grievance Mechanism.	1. 120 days after signing the loan agreement.
		2. Implement the IGM.	2. Evidence of the implementation.	2. As part of the ESCR.
2.4	Occupational health and safety	1. Develop a Project-specific OHS Risk Assessment for all risky work defined in the diagnostic of the Project's activities, containing the guidelines and behaviors to: (i) identify hazards; (ii) evaluate risks; and (iii) establish prevention, correction, control or transfer measures to: (a) protect the physical integrity of employees (prevent injuries and damage to their health).	1. Project-specific OHS Risk Assessment	1. 90 days after signing the loan agreement.

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		2. Implement the Project-specific OHS Risk Assessment.	2. Evidence of the implementation.	2. As part of the ESCR.
2.5	Supply chain	1. Prepare a Sustainable Purchase Policy that: (i) regulates the acquisition of materials, equipment and services; (ii) ensures safe working conditions; (iii) minimizes environmental pollution; (iv) fosters a rational consumption of natural and energy resources; (v) requires its suppliers to meet not only the labor regulations of the countries where they operate but also those for OHS; and (vi) when necessary, allows the Company to impose sanctions to those suppliers that do not comply with these principles.	1. Sustainable Purchase Policy	1. 120 days after signing the loan agreement.
		2. Implement the Sustainable Purchase Policy	2. Evidence of the implementation.	2. As part of the ESCR.
<b>PS 3: Resource Efficiency and Pollution Prevention</b>				
3.1	Greenhouse gases (GHG)	1. Prepare an Annual GHG Emissions Inventory for each of its facilities and road improvement activities of the Project, that includes Scope 1 and Scope 2 explaining the variations detected with respect to the base year.	1. Annual GHG Emissions Inventory	1. As part of the ESCR.
		2. Develop a methodology to account for Scope 3 GHG emissions associated with the Project.	2. Methodology to account for Scope 3 GHG emissions	2. With the first Annual GHG Emissions Inventory.
		3. Adopt the methodology to incorporate Scope 3 in the Annual GHG Emissions Inventory.	3. Evidence of the adoption	3. As part of the ESCR.
<b>PS 4: Community Health, Safety, and Security</b>				
4.1	Infrastructure and Equipment Design and Safety	1. Engage qualified professionals in life and fire safety (L&FS) systems to certify that: (i) the Project's Asphalt Plant has been constructed in compliance with the approved L&FS designs; (ii) all equipment has been installed in compliance with the L&FS designs; and (iii) all L&FS equipment has been tested in compliance with international requirements.	1. Certification of the Fire Protection System.	1. 90 days after signing the loan agreement.