

**Fibra Nova Project - Developing Sustainable Industrial Parks in Mexico  
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 System (ESMS)	1. Prepare an environmental and social management system (ESMS).	1. ESMS	1. 6 months after the first disbursement
		2. Implement the ESMS.	2. Evidence of implementation	2. As part of the Environmental and Social Compliance Report (ESCR)
1.2	Identification of Risks and Impacts	1. Establish an ongoing process to identify and assess the significant environmental, social (E&S) and occupational health and safety impacts associated with its projects.	1. Records of E&S risks as part of the ESMS	1. Prior to the start of the Construction phase of each new project
		2. Update the E&S risk records.	2. Updated E&S risk records	2. As part of the ESCR
1.3	Analysis of Alternatives	1. Develop a site acquisition manual that includes a procedure for the analysis of alternatives.	1. Site acquisition manual	1. 8 months after the first disbursement
1.4	Gender Programs	1. Develop a comprehensive gender policy with a specific protocol for the prevention of workplace harassment, sexual harassment and gender-based violence for contractors	1. Protocol for the prevention of workplace harassment, sexual harassment and gender-based violence as part of the comprehensive gender policy	1. 6 months after the first disbursement
		2. Implement the protocol for the prevention of workplace harassment, sexual harassment and gender-based violence as part of the comprehensive gender policy.	2. Evidence of implementation	2. As part of the ESCR
1.5	Monitoring and Review	1. Establish performance indicators, control matrices and periodic evaluation and adjustment processes as part of ESMS.	1. ESMS	1. 6 months after the first disbursement
1.6	Stakeholder Engagement	1. Develop a stakeholder engagement plan that includes: i) the identification of key stakeholders, ii) the analysis of social risks, iii) the design of specific engagement strategies, iv) the protocol for handling the grievance mechanism, v) a clear definition of roles and responsibilities, and vi) the incorporation of monitoring and continuous improvement mechanisms.	1. Stakeholder engagement plan	1. 5 months after the first disbursement
		2. Implement the stakeholder engagement plan.	2. Evidence of implementation	2. As part of the ESCR
1.7	Informed Consultation and Participation	1. Develop a protocol for conducting public consultations for its projects.	1. Consultation process in the ESMS	1. As part of the ESCR
1.8	External Communication and Grievance Mechanisms	1. Integrate formally the grievance mechanism into the ESMS, with specific procedures to deal with grievances related to the environment and the community (including from vulnerable groups) and well-defined response times and escalation processes.	1. Grievance mechanism as part of the ESMS	1. 5 months after the first disbursement
<b>PS 2: Labor and Working Conditions</b>				
2.1	Grievance Mechanism	1. Develop a specific protocol for the implementation of the grievance mechanism for contractors.	1. Protocol for the grievance mechanism for contractors	1. 5 months after the first disbursement
		2. Implement the grievance mechanism.	2. Evidence of implementation	2. As part of the ESCR
2.2	Supply Chain	1. Adopt a risk-based due diligence approach to the solar equipment supply chain.	3. Evidence of implementation	3. One month before the purchase of solar panels
<b>PS 3: Resource Efficiency and Pollution Prevention</b>				

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3.1	Greenhouse Gases (GHGs)	1. Prepare GHG emission inventories for all its projects, covering direct emissions (Scope 1), indirect ones derived from energy consumption (Scope 2) and those associated with the value chain (Scope 3).	1. GHG emissions inventory	1. 8 months after the first disbursement
		2. Update the GHG emissions inventory.	2. Updated GHG emissions inventory	2. As part of the ESCR
<b>PS 4: Community Health and Safety</b>				
4.1	Community Exposure to Disease	1. Develop a protocol for disease prevention and management (PDPM) for the Construction phase, including training and awareness-raising actions.	1. PDPM	1. 6 months after the first disbursement
		2. Implement the PDPM.	2. Evidence of implementation	2. As part of the ESCR
<b>PS 5: Land Acquisition and Involuntary Resettlement</b>				
5.1	Land Acquisition and Involuntary Resettlement	1. Incorporate guidelines within the site acquisition manual to verify, prior to any acquisitions of land for new development, that: (i) sales agreements are negotiated under free market conditions and with the informed participation of all parties involved; and (ii) such acquisitions do not involve the physical or economic displacement of people who, even though they do not formally own the property, occupy, exploit or rely on such land for other resources.	1. Site acquisition manual	1. 8 months after the first disbursement
		2. Implement the site acquisition manual.	2. Evidence of implementation	2. As part of the ESCR
<b>PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>				
6.1	Protection and Conservation of Biodiversity	1. Incorporate guidelines within the site acquisition manual to verify, prior to any acquisitions of land, the current and previous use of land, the absence of critical habitats or areas of significant biodiversity importance, and the absence of impacts on ecosystem services on which communities depend for their livelihood.	1. Site acquisition manual	1. 8 months after the first disbursement
		2. Implement the site acquisition manual.	2. Evidence of implementation	2. As part of the ESCR
<b>PS 7: Indigenous Peoples</b>				
7.1	Indigenous Peoples	1. Incorporate guidelines in the site acquisition manual for a brief procedure that will allow to record any detected indigenous presence in the areas of interest and the non-applicability criteria, thus ensuring transparency and compliance with the established standards.	1. Site acquisition manual	1. 8 months after the first disbursement
		2. Implement the site acquisition manual.	2. Evidence of implementation	2. As part of the ESCR
<b>PS 8: Cultural Heritage</b>				
8.1	Cultural Heritage	1. Incorporate within the site acquisition manual specific prevention guidelines and clear procedures for acting on chance finds, thus ensuring adequate protection of cultural heritage when projects are developed.	1. Site acquisition manual	1. 8 months after the first disbursement
		2. Implement the site acquisition manual.	2. Evidence of implementation	2. As part of the ESCR