

5. Environmental and Social Action Plan

#	Action Description	Implementation Indicator	Term
1	<p>Develop an overall policy defining goals and principles guiding the company in order to achieve a good environmental and social performance¹.</p> <p>Such policy will establish who is the individual responsible for compliance and implementation assurance within the organization. The client will let the policy be known at all organizational levels.</p>	Copy of the environmental and social policy, and a statement by Management indicating that the policy has been adopted by the company.	Six months from date of first disbursement
2	<p>Designate an individual responsible for environmental, social, and safety issues, and who will directly report to upper management.</p> <p>Develop and implement an Environmental, Social, and Safety Management System (ESMS)² for the company, including contractors, with the following:</p> <ul style="list-style-type: none"> a) Company policies. b) Legal and regulatory framework for the business. c) Designation of individuals responsible for implementing the ESMS³. d) A labor code of conduct and a manual for the employees. 	Copy of the ESMS, with sufficient documentation and evidence proving that it is in effect and operational, and that the system provides sufficient work oversight and monitoring.	Six months from date of first disbursement

¹ IFC, PS1: The policy is the framework for the environmental and social review and management process, specifying that the project (or any business activities, if any) will comply with any applicable laws and regulations within the jurisdictions where operations are conducted, including any laws regarding compliance of obligations by the host country.

² The ESMS seeks to provide for the monitoring and oversight of all workers' field activities (both operational and maintenance work, and construction and assembly work, whether company or contractor's workers), aiming at mitigating their safety and security risks. Namely, it aims at safe occupational procedures that are specific to the relevant activities (for instance, working at heights, handling elements under pressure, etc.), traffic safety, risks associated with construction work, risks of snake or other animal bites when working in rural areas, handling of fuel and oil, handling of herbicides and other pesticides, among other risks.

³ The Technical Representative of the civil work and electromechanical assembly contractor should coordinate with Nucleo's manager for environmental, social, and labor matters, in order to establish any acceptable standards specific to the operations to be conducted, and any environmental, social, and safety risks identified by them. For instance, minimum housing and basic service standards should be established for the work site.

#	Action Description	Implementation Indicator	Term
	e) Environmental and social risk and impact identification mechanism. f) Establishment of programs and procedures to mitigate or eliminate the environmental and social risks. g) Waste management, especially fuels and lubricants from generators, transformer oils and used batteries.. h) Training plans.		
3	Conduct a communication process to inform the leaders of the communities about the civil works and investments that the company implement and receive feedback and answers questions from the stakeholders.	Copy of procedures.	Six months from date of first disbursement
4	Develop and implement a security staff plan including codes of conduct, capacity, equipment and monitoring or oversight standards.	Security Staff Plan	Six months from date of first disbursement