Increasing Renewable Energy Capacity with 360 Energy – ARGENTINA
Environmental and Social Action Plan (ESAP)

No.	Aspect	Action	Output	Delivery Date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Policy	1. Strengthen the Social Responsibility Policy by including the following aspects: i) identification, anticipation, mitigation and, where appropriate, remediation of social impacts; ii) respect for human rights; iii) mandatory engagement with stakeholders; and iv) provision of accessible grievance and complaint mechanisms.	1. Updated Social Responsibility Policy.	1. 30 days before the second disbursement.
1.2	Identification of risks and impacts	1. Update the Project's Integrated Management System (IMS), including, for the construction and operation and maintenance (O&M) phases of each of its components: i) a Social Risk Assessment Procedure; ii) a Social Risk Assessment Matrix; and iii) a Social Management Plan.	1. Updated IMS	1. 30 days before the second disbursement, and then as part of the Environmental and Social Compliance Report (ESCR).
1.3	Direct and indirect impacts and risks	1. For each solar park of the Project, develop Decommissioning Plans that address, at a minimum: i) the dismantling and removal of project infrastructure; ii) the management and disposal of hazardous waste and materials; iii) site remediation and restoration measures; and iv) occupational and community health and safety considerations during the closure phase.	1. Decommissioning Plans for each solar park of the Project.	1. Within 120 days after the first disbursement.
1.4	Cumulative impacts	1. Develop a Cumulative Impact Assessment for the La Rioja IV solar park (SP).	1. Cumulative Impact Assessment for La Rioja IV SP.	1. 30 days before the notice to proceed for La Rioja VI SP.
		2. Implement the Cumulative Impact Mitigation Plan for La Rioja IV SP	2. Evidence of implementation.	2. As part of the ESCR.
1.5	Gender programs	1. Develop and implement for each of the Project components a Gender-Based Violence (GBV) Risk Management Program that includes: i) a policy on gender-based violence and harassment; ii) a policy on non-discrimination, equity, and gender diversity; iii) internal and external accessible and confidential complaint mechanisms to address GBV-related grievances; iv) a specific plan to manage gender-related risks; v) training programs focused on GBV prevention and promotion of a safe and equitable environment, which are mandatory for direct and indirect employees; and vi) a gender indicator monitoring plan.	1. GBV Risk Management Program for each of the Project components.	1. 30 days after the second disbursement, and then as part of the ESCR.
1.6	Organizational capacities and competencies	1. Hire or designate a social specialist to, among other tasks, implement the Social Management Plan and the Project's stakeholder engagement processes.	1. Copy of the contract or designation of the social specialist.	1. 30 days before the first disbursement.
1.7	Emergency preparedness and response	1. Develop and implement Emergency Preparedness and Response Procedures for the construction phase of each of the Project components, which include at a minimum: i) procedures for the identification and assessment of relevant emergency scenarios; ii) protocols for the definition of roles and responsibilities; iii) response procedures for critical scenarios; iv) the identification of meeting points and evacuation routes; v) guidelines for coordination with external services (e.g., fire departments and health centers) and neighbors; vi) guidelines for conducting drills; vi) a formal notification channel to external stakeholders, where appropriate; and vii) provisions to address the most likely contingencies that could pose risks to the community.	1. Emergency Preparedness and Response Procedures for the construction phase	1. 30 days before the first disbursement and then as part of the ESCR.

No.	Aspect	Action	Output	Delivery Date
		2. Develop and implement Emergency Preparedness and Response Procedures for the O&M phase of each of the Project components, with characteristics similar to the procedure developed for the construction phase.	2. Emergency Preparedness and Response Procedures for the O&M phase.	2. Within 30 days prior to the completion of the construction phase and then as part of the ESCR.
1.8	Stakeholder engagement	1. Conduct a stakeholder mapping (including communities) for each of the Project components.	1. Stakeholder mapping for each of the Project components	1. 30 days before the second disbursement.
		2. Develop and implement a Stakeholder Engagement Plan (SEP) for each of the Project components that includes at a minimum: i) the requirement to disclose relevant environmental and social (E&S) information of the project from early stages, and throughout its execution; ii) the identification of stakeholders at the local level; iii) the minimum content of the disclosure (project description and its area of influence, main E&S risks and impacts identified, mitigation measures and management plans, results of the stakeholder engagement process, and grievance and complaint mechanisms available to communities and workers); iii) the frequency of communication; and iv) contact channels (telephone, email, personal and group meetings, etc.).	2. Stakeholder Engagement Plan for each of the Project components.	2. 30 days before the second disbursement, and then as part of the ESCR.
		3. Disclose the external grievance mechanism to neighboring communities and other stakeholders of each component that is part of this Project.	3. Evidence of disclosure.	3. 30 days before the second disbursement.
		4. Provide periodic reports to stakeholders directly affected by the components that are part of this Project, in which it will describe progress in the implementation of the Management Plans with respect to the management and mitigation of risks or impacts on these individuals.	4. Evidence of reports.	4. 90 days after the first disbursement, and as part of the ESCR.
PS 2: Labor and Working Conditions				
2.1	Human resources policies and procedures	1. Adopt for each of the Project components a Labor and Working Conditions Policy that: i) is consistent with national legislation, the fundamental conventions of the International Labour Organization (ILO) and international best practices: ii) is applicable to all phases of the Project: and iii) is mandatory for direct, contracted and subcontracted workers.	1. Labor and Working Conditions Policy	1. 30 days before the second disbursement.
		2. Disclose to direct, contracted and subcontracted workers: i) the Labor and Working Conditions Policy; and ii) documented, clear and understandable information regarding the rights to which they are entitled under national labor and employment legislation, and any applicable collective agreement.	2. Evidence of disclosure.	2. Within 30 days before the second disbursement, and then as part of the ESCR.
		3. Where applicable, ensure that accommodation for direct personnel and personnel contracted by third parties complies with the requirements of the Workers' Accommodation Guidance Note of the International Finance Corporation (IFC) and the European Bank for Reconstruction and Development (EBRD).	3. Compliance verification reports.	3. 60 days after the first disbursement, and then as part of the ICAS.
		4. Conduct an alternatives analysis aimed at promoting employment continuity for local workers.	4. Alternatives analysis for each of the Project components.	4. 30 days before the start of operations of each component.
2.2	Grievance mechanism	1. Disclose to all employees (including workers hired by third parties) information about the grievance mechanism for each of the Project components.	1. Evidence of disclosure.	1. 30 days before the second disbursement, and then as part of the ESCR.
2.3	Occupational health and safety	1. Prepare occupational risk matrices for the construction and O&M phase of each of the Project components, including -when applicable- a risk analysis of operations with which they coexist.	1. Occupational risk matrices for the construction and O&M phase of each of the components that are part of the Project	1. 30 days before the first disbursement.

No.	Aspect	Action	Output	Delivery Date
		2. Implement Occupational Health and Safety Programs for the construction phase of all Project components that contain performance indicators, periodic monitoring requirements, and results review protocols.	2. Occupational Health and Safety Programs for the construction and O&M phase of all Project components	2. 30 days before the first disbursement, and then as part of the ICAS.
		3. Implement Occupational Health and Safety Programs for the O&M phase of all Project components.	3. Occupational Health and Safety Programs for the O&M phase of all Project components	3. 30 days before the end of the construction phase of each project, and then as part of the ICAS.
2.4	Workers hired by third parties	1. Update the Preventive Management Plan with guidelines to manage: i) risks to the environment and neighboring communities (when applicable); and ii) working conditions of workers hired by third parties.	1. Updated Preventive Management Plan.	1. 30 days before the second disbursement, as part of the ICAS.
		2. Develop and implement a Labor Supervision Plan to verify the working conditions of workers hired by third parties for each of the Project components.	2. Labor Supervision Plan	2. 30 days before the second disbursement, and then as part of the ESCR.
2.5	Supply chain	1. Conduct, for each of the Project components, a due diligence process to identify possible risks of child or forced labor in the solar panel supply chain, evaluating potential suppliers, down to the polysilicon level.	1. Due diligence reports for each of the components.	1. 30 days before the Board date.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Greenhouse gases	1. Conduct a Greenhouse Gas (GHG) inventory for the construction and O&M phases for each of the Project components.	1. GHG inventory for Project components.	1. Within 120 days after the first disbursement.
3.2	Pollution prevention	1. Develop a Solar Panel End-of-Life Management Plan for the Project that includes at a minimum: i) an estimated inventory of panels and materials (glass, aluminum, silicon, heavy metals); ii) a progressive retirement or closure schedule; iii) reuse, recycling, and final disposal options; and iv) requirements to periodically update the plan considering technological and regulatory changes.	1. Solar Panel End-of-Life Management Plan.	1. 120 days after the first disbursement.
		2. Update the Chemical Products Management Program, including: i) instructions on compatibility in the storage of hazardous substances; ii) the definition of basic safety conditions for temporary storage sites for hazardous substances (secondary containment, construction materials, fire protection systems, grounding of containers, possible installation of lightning rods and adequate ventilation, among others); and iii) the prohibition of transporting, storing, and using products included in classes "Ia" (extremely hazardous) or "Ib" (highly hazardous) according to the classification recommended by the World Health Organization (WHO).	2. Updated Chemical Products Management Program.	2. 30 days before the first disbursement.
		3. Establish the restriction on the use of class "II" pesticides (such as Cypermethrin), unless they are applied in sites with difficult access for untrained personnel, and provided that adequate equipment, training, and facilities are available for their proper handling and disposal.	3. Evidence of the restriction.	3. 30 days after the first disbursement.
PS 4: Community Health and Safety				
4.1	Community health and safety	1. Implement for each of the Project components the Permanent Monitoring Program.	1. Evidence of implementation.	1. As part of the ESCR.
		2. Develop and implement Traffic Management Plans for each of the Project components.	2. Traffic Management Plans for each of the Project components.	2. 30 days before the second disbursement, and then as part of the ESCR.
		3. Verify that the manufacturing of the Battery Energy Storage System (BESS) components has been carried out under international requirements, through: i) a UL 9540A Test Report; and ii) certificates of conformity with	3. Supplier report.	3. 30 days before receiving the BESS plants.

No.	Aspect	Action	Output	Delivery Date
		NFPA 855; UL 9540; UL9540A; UL1973; UN38.3; IEC62619; IEC 62477-1; IEC 61000-6-2; IEC61000-6-4; IEC 62933-5-2; and IEC 63056 standards		
		4. To attest that the BESS plants have been built and installed in compliance with international regulations, submit the following certificates: i) Electrical and Operational Safety of the plant, issued by an independent firm attesting to compliance with IEC 62933-5-2 standard and current legal requirements; ii) Fire Safety of the plant, issued by an independent firm attesting to compliance with NFPA 855 standard and applicable Argentine regulations; iii) grid interconnection according to IEEE 1547 standard, the technical procedures of the Compañía Administradora del Mercado Mayorista Eléctrico S.A. ("CAMMESA") and the applicable technical and legal regulations of the Wholesale Electricity Market ("MEM").	4. Copy of the certificates.	4. Within 30 days following the construction and installation of the BESS plants.
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
6.1	Biodiversity protection and conservation	1. Conduct a natural habitat assessment at PS La Rioja.	1. Natural habitat assessment.	1. 30 days before the first disbursement.
		2. If necessary, prepare and execute a Biodiversity Offset Plan that guarantees no net loss of biodiversity.	2. Biodiversity Offset Plan	2. 30 days before the first disbursement.