

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

No.	Aspect	Action	Output	Delivery Date
ND 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 mechanisms for complaints and grievances.	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 prior to the second disbursement, as well as thereafter in the Environmental and Social Compliance Report (ICAS).
1.3	Direct and Indirect Impacts and Risks	1. For each Project component, develop Decommissioning Plans that address, as well as: i) the dismantling and removal of project infrastructure; ii) the management and disposal of waste and hazardous materials; iii) site remediation and restoration measures; and iv) Occupational Health and Safety considerations during the closure phase.	1. Decommissioning Plans for each solar park in the Project.	1. Within 120 days following the first disbursement.
1.4	Gender Programs	1. Develop and implement, for this component of the Project, a Comprehensive Gender-Based Violence (GBV) Risk Management Program that includes: i) a comprehensive policy on gender-based violence and harassment; ii) a policy on non-discrimination, equity, and gender diversity; iii) accessible and confidential internal and external grievance mechanisms to address complaints related to GBV; iv) a specific plan to manage gender-related risks; v) training programs focused on preventing GBV and promoting a safe and equitable environment, which are mandatory for direct and indirect employees; and vi) a plan for monitoring gender indicators.	1. Comprehensive GBV Risk Management Program for each of the Projects' components.	1. 30 days after the second disbursement, as well as thereafter, as part of the ICAS.
1.5	Organizational Capacities and Competencies	1. Hire or appoint 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 appointment of the social specialist.	1. 30 days before the first disbursement.
1.6	Emergency Preparedness and Response	1. Develop and implement Emergency Preparedness and Response Procedures for the construction phase of each Project component, which must include as well as: i) procedures for identifying and assessing relevant emergency scenarios; ii) protocols for defining roles and responsibilities; iii) response procedures for critical scenarios; iv) the identification of assembly 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 channel for notifying external stakeholders, when applicable; and vii) provisions for addressing the most likely contingencies that could pose risks to the community.	1. "Emergency Preparedness and Response Procedures" for the construction phase	1. 30 days prior to the first disbursement and as well as thereafter as part of the ICAS.
		2. Develop and implement Emergency Preparedness and Response Procedures for the O&M ⁵ phase of each Project component, with characteristics similar to the procedure developed for the construction phase.	2. Emergency Preparedness and Response Procedures for the O&M ⁵ phase.	2. Within 30 days prior to the completion of the construction phase, it is also necessary to submit the information as part of the ICAS.
1.7	Stakeholder Engagement	1. Conduct a stakeholder mapping exercise (including communities) for each of the Projects' components.	1. Stakeholder mapping for each of the Project's components	1. 30 days before the second disbursement.

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		2. Develop and implement a Stakeholder Engagement Plan (SEP) for each of the Project's components that includes, as well as: i) the requirement to disclose relevant Environmental and Social (E&S) information about the project from early stages and throughout its implementation; ii) the identification of local stakeholders; iii) the minimum content of the disclosure (description of the project and its area of influence, Major Risks and impacts identified in the E&S domain, 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, in-person and group meetings, etc.).	2. Stakeholder Engagement Plan for each component of the Project.	2. 30 days before the second disbursement, as well as thereafter, as part of the ICAS.
		3. Communicate the external grievance mechanism to neighboring communities and other stakeholders of each component that is part of this Project.	3. Evidence of this disclosure.	3. 30 days before the second disbursement.
		4. Provide periodic reports to stakeholders directly affected by the Project components, describing progress in implementing the Management Plans regarding the management and mitigation of risks or impacts on these individuals.	4. Evidence of reporting.	4. 90 days after the first disbursement, as well as part of the ICAS.
ND 2: Employment and Working Conditions				
2.1	Human Resources Policies and Procedures	1. Adopt, for each of the Projects, a Labor and Working Conditions Policy that: i) is consistent with national legislation, the fundamental conventions of the International Labor Organization (ILO), and international best practices; ii) applies to all phases of the Project; and iii) is mandatory for direct, contracted, and subcontracted workers.	1. Employment and Working Conditions Policy	1. 30 days before the second disbursement.
		2. Disclose to direct, contracted, and subcontracted workers: i) the Labor Policy and Working Conditions; and ii) documented, clear, and understandable information regarding their rights under national labor and employment laws and any applicable collective bargaining agreements.	2. Evidence of this disclosure.	2. Within 30 days prior to the second disbursement, as well as thereafter, as part of the ICAS.
		3. Where applicable, ensure that housing for direct staff and third-party contracted staff complies with the requirements of the Guidance Note on Housing for Workers issued by 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, as well as thereafter, as part of the ICAS.
		4. Conduct an analysis of alternatives aimed at promoting job continuity for local workers.	4. Analysis of alternatives for each of the projects' components.	4. 30 days before the start of operations for each component.
2.2	Complaint Handling Mechanism	1. Provide all employees (including workers hired by third parties) with information on the complaint-handling mechanism for each component of the Project.	1. Evidence of dissemination.	1. 30 days before the second disbursement, as well as thereafter, as part of the ICAS.
2.3	Occupational Health and Safety	1. Develop occupational risk matrices for the construction and O&M phases of each Project component, including—where applicable—a risk analysis of coexisting operations.	1. Occupational risk matrices for the construction and O&M ⁵ phases of each Project component	1. 30 days before the first disbursement.
		2. Implement Occupational Health and Safety Programs for the construction phase of all Project components that include performance indicators, periodic monitoring requirements, and protocols for reviewing results.	2. Occupational Safety and Health Programs for the construction and O&M ⁵ phases of all Project components	2. 30 days before the first disbursement, as well as thereafter, as part of the ICAS.
		3. Implement Occupational Safety and Health Programs for the O&M ⁵ phase of all Project components.	3. Occupational Safety and Health Programs for the O&M ⁵ phase of all Project components	3. 30 days before the end of the construction phase of each Project, as well as thereafter as part of the ICAS.

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2.4	Workers Hired by Third Parties	1. Update the Preventive Management Plan with guidelines for managing: i) risks to the environment and neighboring communities (where applicable); and ii) working conditions for workers hired by third parties.	1. Updated Preventive Management Plan.	1. 30 days prior to the second disbursement, as well as part of the ICAS.
		2. Develop and implement a Labor Monitoring Plan to verify the working conditions of workers hired by third parties for each of the project's components.	2. Labor Monitoring Plan	2. 30 days prior to the second disbursement, as well as thereafter, as part of the ICAS.
ND 3: Resource Efficiency and Pollution Prevention				
3.1	Greenhouse Gas	1. Conduct a Greenhouse Gas (GHG) inventory for the construction and O&M ⁵ phases for each of the Project's components.	1. GHG inventory for project components.	1. Within 120 days following the first disbursement.
3.2	Pollution Prevention	1. Develop an End-of-Life Management Plan for Solar Panels for the Project that includes, as well as: i) an estimated inventory of panels and materials (glass, aluminum, silicon, heavy metals); ii) a schedule for phased removal or removal upon project closure; iii) options for reuse, recycling, and final disposal; and iv) requirements for periodically updating the plan to account for technological and regulatory changes.	1. Solar Panel End-of-Life Management Plan.	1. 120 days after the first disbursement.
		2. Update the Chemical 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) a prohibition on the transport, storage, and use of products classified as "Ia" (extremely hazardous) or "Ib" (highly hazardous) according to the classification recommended by the World Health Organization (WHO).	2. Updated Chemical Management Program.	2. 30 days prior to the first disbursement.
		3. Establish a restriction on the use of Class "II" pesticides (as well as Sipertrin), unless they are applied in areas that are difficult for untrained personnel to access, and provided that the appropriate equipment, training, and facilities are available for their proper handling and disposal.	3. Evidence of the restriction.	3. 30 days after the first disbursement.
ND 4: Community Health and Safety				
4.1	Community Health and Safety	1. Implement the Ongoing Monitoring Program for each component of the Project.	1. Evidence of implementation.	1. As well as the ICAS.
		2. Develop and implement Traffic Management Plans for each of the Projects.	2. Traffic Management Plans for each of the Projects.	2. 30 days before the second disbursement, as well as thereafter, as part of the ICAS.
		3. Verify that the components of the Battery Energy Storage Systems (BESS) have been manufactured in accordance with international requirements, through: i) a UL 9540A test report; and ii) certificates of compliance with the following standards: NFPA 855; UL 9540; UL 9540A; UL 1973; UN 38.3; IEC 62619; IEC 62477-1; IEC 61000-6-2; IEC 61000-6-4; IEC 62933-5-2; and IEC 63056	3. Supplier report.	3. 30 days prior to receiving the BESS plants.

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		4. To certify that the BESS plants have been built and installed in compliance with international standards, submit the following certificates: i) Electrical and Operational Safety Certificate for the plant, issued by an independent firm attesting to compliance with IEC 62933-5-2 and applicable legal requirements; ii) Fire Safety Certificate for the plant, issued by an independent firm attesting to compliance with NFPA 855 and applicable Argentine regulations; iii) a certificate for grid interconnection in accordance with the IEEE 1547 standard, the technical procedures of the Compañía Administradora del Mercado Mayorista Eléctrico S.A. ("CAMMESA"), and the technical and legal regulations currently in force applicable to the Wholesale Electricity Market ("MEM").	4. Copies of the certificates.	4. Within 30 days following the construction and installation of the BEES plants.