VILLONACO III – ECUADOR
Environmental and Social Action Plan (ESAP)
Publication Date: June 2026

No.	Aspect	Action	Output	Delivery Date
ND 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Environmental and Social Management System	1. Develop, with the support of an external expert, an ESMS for the construction phase, including: (i) an Environmental and Social Policy; (ii) a procedure and record for the identification and assessment of environmental and social risks and impacts; (iii) environmental and social management programs and plans; (iv) a description of the organizational structure, roles, responsibilities, and the required capacity and competencies; (v) emergency preparedness and response plans and procedures; (vi) a Stakeholder Engagement Plan; (vii) plans and procedures for external communication and a grievance mechanism; (viii) plans and procedures for ongoing communication with affected communities; and (ix) procedures for monitoring, reporting, and reviewing management.	1. ESMS Manual for the construction phase.	1. Within 30 days of the signing of the loan agreement.
		2. Implement ESMS for the construction phase.	2. Evidence of implementation.	2. As part of the Environmental and Social Compliance Report (ESCR).
		3. Develop an Environmental and Social Management System (ESMS) for the operation and maintenance (O&M) phase, which includes: (i) an Environmental and Social Policy; (ii) a procedure and record for identifying and assessing environmental and social risks and impacts; (iii) environmental and social management programs and plans; (iv) a description of the organizational structure, functions, responsibilities, and the required capacity and competencies; (v) emergency preparedness and response plans and procedures; (vi) a stakeholder engagement plan; (vii) plans and procedures for external communication and a grievance mechanism; (viii) plans and procedures for ongoing communication with affected communities; and (ix) procedures for monitoring, reporting, and reviewing management performance.	3. ESMS Manual for the construction phase.	3. 60 days before the start of the O&M phase.
		4. Implement the ESMS for the O&M phase.	4. Evidence of implementation.	4. As part of the ESCR.
1.2	Policy	1. Develop an Environmental and Social Policy for the Project.	1. Environmental and Social Policy	2. Within 15 days of signing the loan agreement.
		2. Disclose the Environmental and Social policy.	3. Evidence of disclosure.	1. Within 30 days of signing the loan agreement.
1.3	Identification of risks and impacts	1. Develop a procedure for identifying and assessing environmental and social hazards and risks, including a standardized methodology for this purpose.	1. Procedure for identifying environmental and social risks and impacts.	1. Prior to financial close.
		2. Prepare a matrix for identifying environmental and social impacts and risks for the Project's construction phase, which, among other aspects, includes: (i) an assessment of risks of landslides or mass movements; (ii) an assessment of the potential impact that shadow flicker could have on sensitive receptors; (iii) a social risk analysis focused on vulnerable groups, gender, diversity, migrant workers, local communities, and contractor and third-party personnel; and (iv) an assessment of the impacts generated by the Project's ancillary components (quarries, access roads, cable laying sites, etc.).	2. Matrix for identifying environmental and social impacts and risks for the construction phase.	2. Prior to financial close.

No.	Aspect	Action	Output	Delivery Date
		3. Conduct a rapid cumulative impact assessment of the Project and, based on the findings, facilitate dialogue and consultation with relevant stakeholders and implement the study's recommendations.	3. Rapid cumulative impact assessment.	3. Within 30 days of the signing of the loan agreement and as part of the ESCR (as applicable).
		4. Develop a matrix to identify environmental and social impacts and risks for the Project's O&M phase, which, among other aspects, includes: i) an assessment of the risks of landslides or mass movements; ii) an assessment of the potential impact that shadow flicker could have on sensitive receptors; and iii) a social risk analysis focused on vulnerable groups, gender, diversity, migrant workers, local communities, and contractor and third-party personnel.	4. Matrix for identifying environmental and Social impacts and risks for the O&M phase.	4. 60 days before the start of O&M.
1.4	Gender Risks	1. Develop a Gender Risk Management Plan that includes: i) the identification of gender risks and potential impacts, both in relation to communities and within the Project; ii) measures to manage the identified risks; iii) measures to maximize the Project's benefits for women (including workers, suppliers, and in relation to communities); iv) arrangements for its implementation; and iv) monitoring and evaluation requirements.	1. Gender Risk Management Plan.	1. Within 30 days of the signing of the loan agreement.
		2. Update the Project's Community Relations Plan to include measures to strengthen the existing capacities of women entrepreneurs and promote the procurement of local services with a gender perspective.	2. Updated Community Relations Plan.	2. Within 30 days of signing the loan agreement.
1.5	Climate Change Exposure	1. Conduct a climate change and natural disaster risk assessment for the Project, including a proposal for the resilience measures deemed necessary.	1. Climate Change and Natural Disaster Risk Study.	1. Within 30 days of the signing of the loan agreement.
1.6	Management Programs	1. Update, harmonize, and consolidate the environmental and social management plans (PMAS) for the wind farm and the transmission line into a single integrated PMAS for the construction phase, so that it includes specific mitigation measures, monitoring actions, roles and responsibilities, and environmental and social performance controls to manage all identified impacts and risks associated with the construction phase of both components of the Project.	1. Updated PMAS for the construction phase.	1. Within 30 days of the signing of the loan agreement.
		2. Implement the updated PMAS.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Based on a household-level survey, develop a prevention and mitigation plan to permanently address the impacts of shadow flicker.	3. Shadow flicker prevention and mitigation plan.	3. 30 days before the start of O&M.
		4. Implement the shadow flicker prevention and mitigation plan.	4. Evidence of implementation.	4. As part of the ESCR.
		5. Update, harmonize, and consolidate the Environmental and Social Management Plans (ESMPs) for the wind farm and the transmission line into a single integrated ESMP for the O&M phase, ensuring it includes specific mitigation measures, monitoring actions, roles and responsibilities, and environmental and social performance controls to manage all identified impacts and risks associated with the construction phase of both components of the Project during the O&M phase.	5. Environmental and Social Management Plan for the O&M Phase	5. 30 days prior to the start of the O&M phase.
		6. Implement the updated ESMP for the O&M phase.	6. Evidence of implementation.	6. As part of ESCR.
1.7	Organizational Capabilities and Competencies	1. Appoint a person responsible for the development and implementation of the Project's ESMS for the construction phase.	1. Appointment or designation document.	1. Prior to financial close.
		2. Submit an organizational chart of the team responsible for managing environmental, social, labor, and health and safety issues during the construction and O&M phases, which must also: i) describe the positions, duties, and responsibilities of each team member; ii) establish the reporting	2. Organizational chart of the team responsible for managing environmental and social, labor, and health and safety issues during the construction phase.	2. Prior to financial close.

No.	Aspect	Action	Output	Delivery Date
		lines; iii) include contractors and subcontractors; and vi) specify reporting lines.		
		3. Appoint a qualified person responsible for the development and implementation of the Project's ESMS for the O&M phase.	3. Appointment or designation document.	3. 45 days before the start of the O&M phase.
		4. Submit an organizational chart of the team responsible for managing environmental, social, labor, and health and safety issues during the O&M phase.	4. Organizational chart of the team responsible for managing environmental and social, labor, and health and safety issues for the O&M phase.	4. 30 days before the start of the O&M phase.
1.8	Emergency Preparedness and Response	1. Update the Emergency Preparedness and Response Plan (EPRP) for the construction phase to ensure it is site-specific, and include: i) identification of emergency scenarios associated with the project's planned activities; ii) medical evacuation protocols; iii) an assessment of potential risks and impacts on local communities; iv) procedures for providing local communities with information about the plan; v) procedures for notifying local communities in the event of an actual emergency; vi) a drills schedule of emergency including the participation of communities from the Project direct area of influence (DAI); and vii) training for all direct and indirect employees on the EPRP procedures, with specific modules for brigades.	1. Updated Emergency Preparedness and Response Plan for the construction phase.	1. Prior to financial close.
		2. Implement the Emergency Preparedness and Response Plan (PPRE) for the construction phase.	2. Evidence of implementation.	2. As part of ESCR.
		3. Develop an ERP for the O&M phase that includes: i) identification of emergency scenarios associated with the project's planned activities; ii) medical evacuation protocols; iii) an assessment of potential risks and impacts on local communities; iv) procedures for providing local communities with information about the plan; v) procedures for notifying local communities in the event of an actual emergency; vi) a drills schedule of emergency drills that are participatory with communities in the direct area of influence; and vii) training for direct and indirect staff, including specific modules for emergency response team members.	3. Emergency Preparedness and Response Plan for the O&M phase.	3. 45 prior to the start of the O&M phase.
		4. Implement the Emergency Preparedness and Response Plan (EPRP) for the O&M phase.	4. Evidence of implementation.	4. As part of ESCR.
1.9	Monitoring and Evaluation	1. Develop a procedure for evaluating the ESMS that includes key performance indicators (KPIs) for the construction phase.	1. Procedures for evaluating the performance of the ESMS during the construction phase.	1. Within 15 days of signing the loan agreement.
		2. Implement the ESMS performance evaluation procedure for the construction phase.	2. Evidence of implementation.	2. As part of ESCR.
		3. Develop a procedure to evaluate the ESMS that includes key performance indicators (KPIs) for the O&M phase.	3. ESMS performance evaluation procedures for the O&M phase.	3. 30 days before the start of the O&M phase.
		4. Implement the ESMS performance evaluation procedure for the O&M phase.	4. Evidence of implementation.	4. As part of ESCR.
		5. Develop a matrix of compliance with legal and contractual obligations, which, among other relevant information, includes: i) the name of the regulatory agency that issues the permit or license; ii) the dates of issuance and validity; and iii) the internal personnel responsible for monitoring renewals.	5. Legal and Contractual Compliance Matrix.	5. Within 15 days of signing the credit agreement.
1.10	Stakeholder Engagement	1. Develop, with the support of an external expert on social and gender issues, a Stakeholder Participation Plan (SPP) for all stages of the Project that includes: i) a mapping of all direct, indirect, and vulnerable stakeholders of	1. Stakeholder Engagement Plan.	1. Within 15 days of the signing of the loan agreement and 30 days before the start of the O&M phase.

No.	Aspect	Action	Output	Delivery Date
		the Project; ii) procedures for planning stakeholder participation and types of communication methods; iii) a detailed description of the lines of communication with each group; iv) a description of participatory monitoring mechanisms; v) a detailed description of strategies for sharing information on the Project's Environmental and Social performance with stakeholders; vi) provisions for contracting local services with a gender perspective; vii) specific actions to promote the employment of women in the Project's area of influence; and viii) gender-sensitive hiring and retention policies and practices, in line with international best practices.		
		2. Implement the PPPI.	2. Evidence of implementation.	2. As part of ESCR.
	Informed Consultation and Participation	3. Prepare a report on the public participation process that: i) details all public consultation activities already carried out; ii) summarizes any additional stakeholder engagement activities that have been conducted; iii) details the issues that have been consulted on; iv) contains a list of the groups that have been consulted; and iv) lists the plans to support the development of urban and rural parishes.	3. Report on the consultation and participation process.	3. Within 15 days of the signing of the loan agreement.
		4. Conduct a documented, ongoing, transparent, and culturally appropriate consultation and informed participation process ("CPI") that allows for the systematic incorporation of the opinions, concerns, and expectations of the communities and other affected stakeholders throughout the Project's development.	4. Report on the consultation and participation process.	4. Within 15 days of the signing of the loan agreement and as part of the ESCR.
	Disclosure of Information	5. Prepare a schedule for disseminating information about the Project, which, among other things, should include: i) the minimum content to be communicated (progress of activities, upcoming milestones, impact management, and the status of responses to concerns and complaints); ii) a detailed description of how the Project's risks and impacts on communities have been and will be managed; iii) a summary of the stakeholder engagement processes; iv) details of the complaints received and handled by the external complaints mechanism; v) an explanation of the culturally appropriate means and formats for dissemination; vi) a list of the individuals designated to prepare and disseminate the information; and vii) a system for recording and verifying that the information has been delivered and understood.	5. Schedule for the Disclosure of Project Information.	5. Within 15 days of the signing of the loan agreement and as part of the ESCR.
		6. Develop and implement a specific procedure for the disclosure of information related to the transport of oversized cargo.	6. Specific procedure for the dissemination of information related to the transport of oversized cargo.	6. 30 days prior to the arrival of the Project's oversized cargo and as part of the ESCR.
1.11	External Communications	1. As part of the Stakeholder Engagement Plan (PPPI), develop an external communications program that: i) establishes two-way communication channels (email, hotline, social media, or messaging) to ensure the traceability of information received and sent; ii) designate an institutional spokesperson to manage media relations and respond to inquiries; iii) require the production of periodic newsletters and press releases (digital and print) on progress, Environmental and Social measures, complaint mechanisms, and community actions; and iv) use monitoring indicators to evaluate the external communications program.	1. External Communications Program.	1. Within 15 days of signing the loan agreement.
		2. Implement the external communications program.	2. Evidence of implementation.	2. As part of ESCR.
1.12	External Complaints Mechanism	1. Update the external complaints mechanism to include: i) a detailed description of the scope and types of questions, complaints, claims, and	1. Updated external complaint mechanism.	1. Within 15 days of signing the credit agreement.

No.	Aspect	Action	Output	Delivery Date
		suggestions (PQRS); ii) principles of accessibility, confidentiality, and non-retaliation; iii) a list of the different channels for receiving PQRS (which must also be culturally appropriate); iv) a flowchart describing the stages of receipt, resolution, and appeal; v) a breakdown of deadlines by stage and by type of PQRS; vi) a system for recording and tracking; vii) performance indicators and monitoring; viii) a description of the responsibilities of in-house staff and contractors for implementing the mechanism; ix) details of the process for managing PQRS based on their severity level; and x) procedures for collecting PQRS from vulnerable groups.		
		2. Implement the external complaints mechanism.	2. Evidence of implementation.	2. As part of the ESCR.
ND 2: Work and Working Conditions				
2.1	Human Resources Policies and Procedures	1. Develop a Labor Management Plan (LMP) that is mandatory for all Project workers, including the EPC and subcontractors, which: i) ensures decent working conditions; ii) promotes local employment, equal opportunity, and non-discrimination, including the implementation of gender-sensitive hiring and retention policies aligned with international best practices; iii) requires zero tolerance for sexual harassment, violence, and gender-based harassment (GBVH); iv) prohibits the use of child labor and forced labor; v) protects whistleblowers; vi) upholds freedom of association and the right to collective bargaining; and vii) includes a non-discrimination and equal opportunity policy applicable to all Project workers	1. Labor Management Plan.	1. Within 15 days of the signing of the loan agreement.
		2. Implement the Labor Management Plan (LMP).	2. Evidence of implementation.	2. As part of the ESCR.
		3. Require the EPC to develop and implement a human resources (HR) policy that: i) is aligned with that of the Project and with the applicable legal and regulatory requirements in Ecuador; and ii) includes the principles of non-discrimination and equal opportunity.	3. EPC HR policy and procedures.	3. Within 15 days of the signing of the loan agreement.
		4. Include, as part of the mandatory orientation process for all direct and subcontracted workers, training on HR policies and the Project's Code of Conduct, including specific requirements related to GBVH.	4. Evidence of training.	4. Within 30 days of signing the loan agreement.
		5. Update the Local Hiring Procedure (LHP) to incorporate: i) non-discrimination criteria; ii) a gender-sensitive approach; iii) territorial prioritization criteria; iv) a person responsible for labor registration; v) elements to ensure the traceability of the process; vi) protocols for auditing contractors; and vii) dissemination of the LHP and its implementation to the communities in the DAI.	5. Local Hiring Procedure.	5. Within 30 days of the signing of the loan agreement.
		6. Implement the PCL.	6. Evidence of implementation.	6. As part of the ESCR.
2.2	Workforce Reduction	1. Develop and implement a Workforce Reduction Plan (PRFL) that includes, among other aspects: i) procedures to support workers in their reentry into the workforce; ii) the Project's commitment to comply with all applicable legal and contractual requirements; and iii) measures to mitigate the adverse impacts of the reduction process (payment of costs for workers' return to their place of origin, etc.).	1. Workforce Reduction Plan.	1. Within 120 days of the signing of the loan agreement and subsequently as part of the ESCR.
2.3	Internal Complaint Handling Mechanism	1. Develop and implement an internal grievance mechanism ("IGM") that extends to the EPC and subcontractors and includes, among other aspects: i) a description of how to receive, respond to, investigate, address, and document complaints that are filed; ii) details on the methods and frequency of communicating the mechanism to direct and indirect workers (EPC,	1. Internal grievance mechanism.	1. Within 30 days of signing the credit agreement.

No.	Aspect	Action	Output	Delivery Date
		contractors, and suppliers); iii) a specific channel for handling complaints regarding harassment, discrimination, or gender-based violence; iv) protocols for receiving anonymous complaints; and v) a zero-tolerance policy against retaliation for those who use the mechanism.		
2.4	Occupational Health and Safety	1. Develop and implement a Corporate Occupational Health and Safety Management Plan, which includes specific corporate guidelines that provide a structured framework for managing the EPC and its subcontractors during the project's construction phase.	1. Corporate Occupational Safety and Health Management Plan for the construction phase.	1. Within 30 days of signing the loan agreement and subsequently as part of the ESCR.
		2. Update and ensure the the EPC implements the EPC's project-site specific Health and Safety Plan so that it is consistent with the Project's risks, applies to all its workers, and includes: i) a formal OSH policy and objectives; ii) defined roles and responsibilities; iii) hazard identification and risk assessment for all Project activities, including associated facilities, following the hierarchy of risk mitigation; v) the identification and management of gender-specific risks; vi) operational control procedures (OCPs) for occupational health and safety (OHS) risks identified in the Hazard Identification and Risk Assessment (HIRA) matrix; vii) a training program that includes (a) mandatory basic OSH training for all personnel (including training on gender-specific risks) and (b) specialized training for personnel performing high-risk activities; and viii) key performance indicators and monitoring mechanisms aimed at preventing workplace accidents and occupational diseases.	2. Updated ECP Health and Safety Plan.	2. Within 30 days of the signing of the loan agreement and subsequently as part of the ESCR.
		3. Develop and implement a procedure for the selection and management of temporary workers accommodations for the Project, including a monitoring protocol with check lists, which shall define at minimum: i) clear selection criteria; and ii) the minimum habitability conditions (standard) and health and safety standards that must be met consistent with relevant international good practice.	3. Procedure for selecting temporary housing.	3. Within 15 days of signing the loan agreement
		4. Submit reports for each temporary housing facility that include, among other aspects: i) the number of workers housed; ii) the name of the contractor responsible; iii) any incidents recorded; and iv) a detailed description of the follow-up and control measures taken to address the incidents.	4. Reports on temporary housing.	4. As part of the ESCR.
		5. Develop and implement a Corporate Occupational Safety and Health (OSH) Management Plan, which includes specific corporate guidelines that structurally regulate the management of the EPC and its subcontractors during the O&M phase.	5. Corporate Occupational Safety and Health Management Plan for the O&M phase.	5. 45 days before the start of the O&M phase and thereafter as part of the ESCR.
2.5	Third-Party Contractors	1. Develop a Contractor Management Plan (CMP) for the Project, establishing procedures and responsibilities for the selection, hiring, supervision, and monitoring of the environmental and social, health, and safety (ESHS) performance of the EPC, contractors, and subcontractors for the Project, including the EPC's health and safety plan (2.4.2).	1. Contractor Management Plan.	1. Within 30 days of the signing of the loan agreement.
		2. Implement the CMP.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Train contractors and subcontractors on the following topics: i) Environmental and Social, Occupational Safety and Health (OSH), and Labor Policies, as well as the Code of Conduct; and ii) zero tolerance for gender-based violence, sexual harassment, workplace harassment, and discrimination	3. Evidence of training.	3. Within 30 days of signing the credit agreement.

No.	Aspect	Action	Output	Delivery Date
2.6	Supply Chain	4. Develop and implement a Supplier Selection and Evaluation Manual that, among other aspects: i) includes periodic checks to verify compliance with Environmental and Social standards; ii) defines clear criteria for issuing warnings, imposing administrative sanctions, or replacing suppliers based on the severity of Environmental and Social non-compliance; iii) expressly prohibits the use of any form of child labor or forced labor in the production of wind turbine components; iv) include requirements for the implementation of measures to protect workers' health and safety; and v) include measures to promote gender equality.	4. Supplier Selection and Evaluation Manual.	4. Within 30 days of signing the loan agreement and thereafter as part of the ESCR.
ND 3: Resource Efficiency and Pollution Prevention				
3.1	Greenhouse Gas	1. Conduct a Scope 1 and Scope 2 Greenhouse Gas (GHG) emissions inventory for the construction phase.	1. GHG Inventory.	1. 90 days into the first year of construction.
		2. Develop a Resource Management Plan to improve the efficiency of water, electricity, and other natural resource consumption	2. Resource Management Efficiency Plan.	2. Within 30 days of signing the loan agreement.
		3. Implement the Resource Management Efficiency Plan.	3. Evidence of implementation.	3. As part of the ESCR.
3.2	Waste	1. Develop a Waste Management Plan (WMP) for the construction phase, which includes management measures for hazardous, non-hazardous, and special solid waste, as well as for the wastewater generated, aligned to the good international industry practices in waste management.	1. WM Plan for the construction phase.	1. Within 30 days of signing the loan agreement.
		2. Implement the WMP for the construction phase.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Develop a Waste Management Plan (WMP) for the O&M phase, which includes management measures for hazardous, non-hazardous, and special solid waste, as well as for the wastewater generated, aligned to the good international industry practices in waste management.	3. WMP for the O&M phase.	3. Within 15 days prior to the start of O&M.
		4. Implement the WMP for the O&M phase.	4. Evidence of implementation.	4. As part of the ESCR.
3.3	Hazardous Materials	1. Develop a procedure for handling hazardous materials (fuels, lubricating oils, paints, solvents), aligned with good international industry practices in hazardous materials management, which includes, among other topics, the following: i) storage conditions for each type of waste; ii) the requirement to maintain a Material Safety Data Sheet (MSDS) for each product; iii) information on substance incompatibilities; and iv) a contingency plan in the event of spills or accidents.	1. Hazardous Materials Handling Procedure.	1. Within 15 days of signing the credit agreement.
		2. Implement the hazardous materials handling procedure.	2. Evidence of implementation.	2. As part of the ESCR.
ND 4: Community Health and Safety				
4.1	Community Health and Safety	1. Develop a Road Safety and Traffic Management Plan (PSVMT) that includes: i) hazard identification and risk assessment along the route from Puerto Bolívar and on all access roads to the Project; and ii) identification of sensitive locations along the usual routes of heavy-duty and light-duty vehicles used by both in-house and contracted personnel; iii) a detailed description of coordination activities with local authorities and traffic police (to implement detours and improve road safety during the transport of oversized wind tower components), as applicable; iv) specific driving guidelines for each route; v) a detailed description of the mandatory defensive driving courses that all in-house and contracted truck and machinery drivers must complete; and vi) procedures for conducting random alcohol and drug testing for in-house and contracted drivers of heavy-duty and light-duty vehicles and machinery.	1. Traffic Management Plan.	1. Within 30 days of signing the loan agreement.

No.	Aspect	Action	Output	Delivery Date
		2. Implement the traffic management plan.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Develop a community health and safety management plan, which includes: i) a program for the prevention of and response to infectious diseases; ii) measures for managing workers suspected of being infected; iii) training requirements for workers on the infectious diseases posing the greatest risk to the Project; iv) protocols for conducting awareness campaigns for workers and the community; and v) communication protocols with the communities.	3. Community Health and Safety Management Plan.	3. Within 30 days of signing the loan agreement.
		4. Implement the community health and safety management plan.	4. Evidence of implementation.	4. As part of the ESCR.
4.2	Security personnel	1. Develop a physical security management plan for the Project that includes: (i) a physical security risk assessment; (ii) procedures for vetting security personnel; and (iii) training requirements for security personnel on the Voluntary Principles on Security and Human Rights.	1. Physical security management plan.	1. Within 30 days of signing the loan agreement.
		2. Implement the physical security management plan.	2. Evidence of implementation.	2. As part of the ESCR.
ND 5: Land Acquisition and Involuntary Resettlement				
5.1	Physical and economic displacement	1. Develop a socioeconomic baseline that: (i) characterizes the potentially affected population, especially those in vulnerable conditions; and (ii) based on an analysis of the remaining areas, determines how they will be impacted.	1. Socioeconomic Census Report.	1. Within 30 days of the signing of the loan agreement.
		2. Develop (where applicable) Livelihood Restoration Plans (LRPs) to address the economic displacement associated with the Project, including: i) a rights matrix covering landowners, occupiers (individuals or groups), and tenants who may be affected by the Project; ii) procedures to ensure that the quality of life of affected people improves or, at a minimum, is maintained following resettlement; iii) a gender-based approach to impacts on land and livelihoods, ensuring that women benefit equitably from compensation and livelihood restoration measures; iv) a program for informing, consulting with, and involving affected people; v) follow-up and corrective measures to address implementation gaps; vi) clearly defined KPIs to measure the effectiveness of livelihood restoration outcomes; and vii) monitoring and reporting protocols to track the status of implementation and performance of the LRPs.	2. Livelihood Restoration Plan.	2. Within 60 days of the signing of the loan agreement.
		3. Implement the livelihood restoration plans.	3. Evidence of implementation.	3. As part of the ESCR.
		4. Develop (where applicable) a land acquisition plan that guarantees those affected compensation equal to or greater than the replacement costs of the assets affected by displacement.	4. Land acquisition plan.	4. 30 days after the land acquisition process is completed.
		5. In the case that the rehabilitation of the access road for the oversized load implies the temporary or definite physical or economical displacement, the Client will prepare a framework for the Resettlement Action Plan (RAP) of the potential affected individuals.	5. Resettlement Action Plan Framework.	5. Within 30 days of the signing of the loan agreement.
		6. Conduct, if applicable, an independent audit upon completion of the physical and economic resettlement process, including: i) an assessment of the effectiveness of the mitigation measures implemented (including key performance indicators); ii) an assessment of the conditions of each affected person following displacement; iii) a comparison of the results of implementation with the agreed-upon objectives; and iv) lessons learned from the process.	6. External audit reports on the restoration of livelihoods.	6. 18 months after the completion of the construction phase.
ND 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				

No.	Aspect	Action	Output	Delivery Date
6.1		1. Supplement the Project's Critical Habitat Assessment (CHA) to include the wind farm and transmission line.	1. Critical Habitat Assessment Report aligned with ND 6.	1. Prior to financial close.
		2. Based on the results of the Critical Habitat Assessment, prepare a Biodiversity Action Plan (BAP) that includes: i) an analysis of the project's residual impacts on biodiversity, particularly on Priority Biodiversity Values (PBVs) (or their habitats); ii) a detailed description of the measures to achieve and demonstrate no net loss of PBVs (when natural habitats are affected) or a net gain in biodiversity (for PBVs associated with critical habitats); iii) clearly defined roles and responsibilities, as well as mechanisms for review, adaptive management, and adjustment of mitigation measures; iv) a list of KPIs to measure the effectiveness of the proposed measures; and v) an indicative budget to ensure the adequate and sustained implementation of the BAP.	2. Biodiversity Action Plan.	2. 30 days after the critical habitat assessment is completed.
		3. Implement the Biodiversity Action Plan (BAP).	3. Evidence of implementation.	3. As part of the ESCR.
		4. Develop a biodiversity monitoring and evaluation program (BMEP), with a special focus on VPB and the net zero loss and net gain targets.	4. Biodiversity Monitoring and Evaluation Program.	4. 15 days after the PAB is completed.
		5. Implement the BMEP.	5. Evidence of implementation.	5. As part of the ESCR.
		6. Prepare a plan for the closure and restoration of vegetation along access roads (where applicable) that includes: i) the methodology for restoring native vegetation along access roads that were built in modified habitats; ii) measures for maintaining and monitoring the restoration; iii) a protocol to prevent the unintentional introduction of exotic and invasive species; and iii) KPIs to measure performance.	6. Access Road Closure and Restoration Plan.	6. 15 days prior to the start of O&M.
		7. Develop an Adaptive Management Plan (AMP) for the O&M phase, including: i) a plan for monitoring bird and bat mortality that takes into account adjustments to the frequency, duration, and continuity of bird and bat monitoring campaigns based on the results obtained; ii) bias correction tests; iii) estimates of mortality rates; and iv) an adaptive management strategy.	7. Adaptive Management Plan for the O&M phase.	7. After 180 days, based on the results of the PMMAM.
		8. Implement the AMP.	8. Evidence of implementation.	8. As part of the ESCR.
6.2	Ecosystem Services Management	1. Develop a mitigation plan for impacts on ecosystem services (ESS) that includes: i) identification of priority ESS; ii) measures to mitigate the project's impacts on ESS; and iii) KPIs to measure performance.	1. Ecosystem Services Impact Mitigation Plan.	1. Within 30 days of signing the loan agreement
		2. Implement the mitigation plan for impacts on ESS.	2. Evidence of implementation.	2. As part of the ESCR.
ND 8: Cultural Heritage				
8.1	Protection of cultural heritage	1. Develop and implement the Chance Finds Procedure for the Project's construction phase.	1. Procedure for Unexpected Finds.	1. Within 30 days of signing the loan agreement and thereafter as part of the ESCR.
		2. Train personnel involved in construction activities on the procedure for accidental discoveries.	2. Evidence of training.	2. Within 30 days of the signing of the loan agreement.