

**Atis Telecom Towers Equity Investment – Regional  
Environmental and Social Action Plan (ESAP or ESAP)**

No.	Aspect	Action	Product	Delivery Date
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>				
1.1	Environmental, Social, and Health and Safety Policy	1. Develop an Environmental, Social, and Health and Safety Policy that: i) is applicable to all Project activities; ii) is mandatory for own personnel, suppliers, contractors and subcontractors; iii) contemplates the well-being of the immediate community including (neighbors, employees, suppliers and other interested parties); and iii) is consistent with legal requirements, ATIS policies and international best practices.	1. Environmental, Social, and Health and Safety Policy	1. Three months after first disbursement
		2. Implement the Project's Environmental, Social, and Health and Safety Policy	2. Evidence of implementation	2. As part of the AMSR
1.2	Legal Requirements	1. Prepare a matrix of legal requirements for each country	1. Matrices for identification and evaluation of legal aspects.	1. Three months after first disbursement
		2. Implement the legal requirements matrices.	2. Evidence of Implementation	2. As part of the AMSR
1.3	Identification and evaluation of environmental, social, and health and safety risks and impacts Environmental, social, and health and safety	1. Develop a matrix of environmental, social and health and safety risks and impacts for the Project, allowing evaluation (probability of occurrence and severity of effects) and classification of such risks.	1. Identification Matrix	1. Six months after first disbursement
		2. Implement the Identification and Evaluation of Risks and Impacts	2. Evidence of Implementation	2. As part of the AMSR
1.4	Environmental and Social Management Plan (ESMP)	1. Develop procedures to manage environmental and social risks containing, among others, the following elements: i) purpose of the procedure, specifying the target risk; ii) scope, specifying to which location, components or persons it applies; iii) definitions; iv) responsibilities for planning, execution, supervision and control processes; v) references, applicable standards, manuals and associated documentation; vi) required resources, tools and equipment; vii) management methodology, work instructions; viii) required training; ix) key indicators, records; and x) approval authority, version and date.	1. Management Programs	1. Maximum of nine months after first disbursement. A staggered delivery will be considered (3, 6 and 9 months).
		2. Implement the Management Programs, including training plans.	2. Evidence of Implementation	2. As part of the AMSR
1.5	Emergency Prevention and Response Plan (EPRP)	1. Develop an EPRP for the Project that includes: i) most probable emergency scenarios (strong winds, electrical storms, fires, accidents); ii) a list of preventive actions (constitution and definition of brigade functions, establishment of meeting points and escape routes, emergency signage, fire and alarm systems, emergency lighting, protection and rescue equipment, training and drills; and coordination with contractor and subcontractor companies); iii) details of the chain of command that will act during the emergency; iv) identification of and coordination with external actors (ambulance, hospitals, firefighters, police, authorities and civil	1. Submit Emergency Prevention and Response Plan	1. Six months after first disbursement

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		organizations); v) emergency response and first aid procedures; and vi) a flowchart of internal and external communications.		
		2. Implement the EPRP including the training and drill plan	2. Evidence of Implementation	2. As part of the AMSR
1.6	Monitoring and evaluation	1. Develop an Environmental, Social, and Safety and Hygiene Monitoring Plan that contemplates statistics on: i) frequency and severity rates of accidents for own personnel and contractors; ii) incidents and unsafe working conditions; iii) other parameters requiring monitoring as specified in the Work Safety and Hygiene Study and Plan, iv) number of community complaints received and resolved or pending resolution; v) fuel consumption; vi) quantity and type of hazardous and non-hazardous waste generated and their treatment methods; and vii) number of training courses provided and attendance records.	1. Updated environmental, social and labor monitoring plans.	1. Nine months after first disbursement
		2. Implement the Environmental, Social, and Safety and Hygiene Monitoring Plan.	2. Evidence of implementation.	2. As part of the AMSR.
1.7	Stakeholder Engagement Plan	1. Develop a Stakeholder Engagement Plan that includes: i) designation of a community liaison officer; ii) identification and mapping of interested parties; iii) Project dissemination mechanism; iv) channels and procedures for two-way communication with interested parties; and v) forms of recording and communicating to interested parties about responses to their opinions or requests.	1. Stakeholder Engagement Plan	1. Six months after first disbursement
		2. Implement the Stakeholder Engagement Plan.	2. Evidence of Implementation	2. As part of the AMSR
1.8	Grievance and Complaint Mechanism for the Community	1. Develop a Grievance and Complaint Management Mechanism for the Community that: i) allows capturing complaints anonymously; ii) defines (a) the steps and timeframes for investigation and resolution of complaints, and (b) the persons responsible for carrying it out; and iii) contains procedures to communicate to those involved, including community members in the case of anonymous complaints, the results of actions taken in response to grievances or complaints.	1. Grievance and Complaint Management Mechanism	1. Six months after first disbursement
		2. Implement the Grievance and Complaint Management Mechanism	2. Evidence of Implementation	2. As part of the AMSR
1.9	Chance Finds Procedure.	1. Develop a Chance Finds Procedure.	1. Chance Finds Procedure.	1. Nine months after first disbursement
<b>PS 2: Labor and Working Conditions</b>				
2.1	Safety and Hygiene for Contractors	1. Add to contracts signed with contractors and suppliers, the obligation to comply with the ESMP and to extend it to subcontractors.	1. Evidence of incorporation of the obligation to comply with the ESMP for Contractors.	1. As part of the ESMP Maximum one year after first disbursement

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2.2	Grievance and Complaint Mechanism for Workers	1. Extend the scope of the Grievance and Complaint Management Mechanism for the Community to workers, both own and contractors and subcontractors.	1. Grievance and Complaint Management Mechanism for Workers	1. Six months after first disbursement
		2. Implement the Grievance and Complaint Management Mechanism	2. Evidence of Implementation	2. As part of the AMSR
2.3	Workforce reduction	1. Develop a workforce reduction plan for personnel that: i) ensures that contractors and subcontractors comply with all legal and contractual requirements corresponding to the termination of personnel assigned to tasks at ATIS; and ii) mitigates the adverse impacts that the termination of workers may cause.	1. workforce reduction plan	1. Before the six months prior to the completion of the construction stage, no earlier than six months after the first disbursement
		2. Implement the workforce reduction plan	2. Evidence of Implementation	2. As part of the AMSR
2.4	Provisions for people with disabilities	1. Develop a strategy for the inclusion of employees with disabilities, both in permanent and temporary positions, and allow for the adaptation of physical facilities as necessary.	1. Strategy for the inclusion of employees with disabilities	1. Six months after first disbursement
		2. Implementing the strategy	2. Evidence of Implementation	2. As part of the AMSR
<b>PD 3: Resource Use Efficiency and Pollution Prevention</b>				
3.1	Greenhouse Gases (GHG)	1. Calculate GHG emissions for the year ending.	1. GHG calculation	1. Within two months after the year ending. Three months for current year
		2. Forecast GHG emissions for the year beginning.	2. GHG forecast	2. Within two months before the year beginning.
3.2	Pollution prevention	1. Include in the ESMS specific measures to reduce particulate matter emissions during construction, particularly at work fronts, as well as in the transport of materials and waste by applying best practices in the matter.	1. Incorporation of measures in the ESMS.	1. As part of the ESMS
		2. Implement particulate matter reduction measures.	2. Evidence of Implementation.	2. As part of the AMSR
3.3	Waste	1. Ensure the availability of complete spill control kits during construction.	1. Proof of availability of complete spill kits at all facilities.	1. Six months after first disbursement
		2. Identify authorized Solid and Hazardous Waste Operating Companies for the proper disposal of waste	2. List authorized solid and hazardous waste operating companies	2. As part of the AMSR
		3. Keep records until final disposal of hazardous waste.	3. Waste disposal record	3. As part of the AMSR

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<b>PD 4: Community Health and Safety</b>				
4.1	Emergency preparedness and response	1. Coordinate assistance and collaboration with communities, local government agencies, and other relevant actors in preparations to respond effectively to emergency situations.	1. Evidence of assistance and coordination.	1. As part of the AMSR
4.2	Hazardous materials management	1. Include in the ESMS specific provisions for the handling and storage of hazardous materials that comply with local regulations and the World Bank's General Environmental Guidelines.	1. Specific ESMS procedures	1. As part of the ESMS