

Sal de Oro Project: Supporting Lithium Production Ramp-Up in Argentina Environmental and Social Action Plan (ESAP)

No.	Aspect	Action	Deliverable	Projected Completion Date
PS 1: Assessment and management of environmental and social risks and impacts				
1.1	Documentation and Permitting	- Obtain the necessary environmental permits and authorizations for the execution of the Project's pending ancillary works, as applicable. - Submit an updated matrix of permits and authorizations required for each phase of the Project (construction and operation, as applicable).	- Copy of pending permits and authorizations. - Updated matrix of permits and authorizations.	15 days prior to the start of construction on each pending auxiliary work for the Project. - As part of the Environmental and Social Compliance Report ("ESCR")
1.2	Environmental and Social Management System ("ESMS")	- As part of the Project-specific ESMS, prepare a Decommissioning Plan for the construction phase. - Develop, for the Project's operation and closure or abandonment phases, an ESMS that includes environmental and social ("E&S") plans, programs, and procedures incorporating the results obtained from (a) studies still underway, (b) change management, and (c) lessons learned during the implementation of the construction phase.	- Decommissioning Plan for the construction phase. - ESMS for the operation, closure, or abandonment of the Project.	- Within the first 3 months following the first disbursement. - Prior to operation.
1.3	Identification of Risks and Impacts	- Update the Project's Socioeconomic Risk and Impact Assessment to include Phase II or "CP2" activities, as well as the results of the consultation process with (a) the seasonal and permanent rural population, (b) the indigenous peoples, and (c) the communities and small-scale ranchers located within the Project's social influence area. - Update the Rapid Cumulative Impact Assessment ("RCIA") for the Project's <i>upstream</i> site to include: (i) updated CP2 activities; and (ii) an assessment of the updated impacts and risks on water use and management (both surface and groundwater) and their effects on biodiversity and the socioeconomic activities of communities within the area of influence.	- Updated Socioeconomic Risk and Impact Assessment. - Updated RCIA for the <i>upstream</i> site.	- Within the first 3 months following the first disbursement. - Within the first 6 months following the first disbursement.
1.4	Gender Risk	- Develop a Gender Management Plan that includes: (i) an assessment of the Project's potential gender-related risks and impacts; (ii) measures to manage the identified gender-related risks and impacts; (iii) a training plan for workers, including contractors, on gender-based violence and harassment, the Code of Ethics, and the Human Rights ("HR"); and (iv) measures to maximize the Project's benefits for women, including female workers and suppliers. - Implement the Gender Management Plan	- Gender Management Plan. - Evidence of implementation.	- Within the first 3 months following the first disbursement. - As part of ESCR.
1.5	Management Programs	Update the Project's Environmental Management Plan ("EMP") to include management measures to address: (i) the potential risks and impacts of CP2; (ii) any potential impacts identified in the updated socioeconomic impact assessment; and (iii) any potential impacts identified in the updated RCIA.	Updated EMP.	Within the first 3 months following the first disbursement.
1.6	Organizational Capacity and Competence	Submit an update to the project's E&S management organizational chart.	Updated E&S Project management organizational chart.	Prior to the first disbursement.
1.7	Participation of Social Actors	Update the Community Engagement Plan ("PRC") to include key social stakeholders potentially impacted by CP2's activities, specifically the small-scale farmers in Catamarca.	Updated PRC.	Within the first 3 months following the first disbursement.

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1.8	Complaints mechanism for affected communities	1. Update the Project's Grievance Mechanism ("MAQ") to make it accessible to communities potentially affected by the activities of Phase CP2.	1. Updated MAQ.	1. Within the first 3 months following the first disbursement.
PS 2: Labor and Working Conditions				
2.1	Working Conditions and Terms of Employment	1. Prepare a Demobilization and Workforce Reduction Plan for the completion of construction at CP2 of the Project, which guarantees all workers: (i) access to information on potential post-reduction employment alternatives; (ii) timely receipt of layoff notices; and (iii) severance payments as provided by law and collective bargaining agreements.	1. Workforce Reduction and Demobilization Plan.	1. Within the first 3 months following the first disbursement.
		2. Implement the Demobilization and Workforce Reduction Plan.	2. Evidence of its implementation.	2. As part of the ESCR.
2.2	Supply chain	1. Update the Local Supplier Development Plan to require all suppliers to comply with labor requirements (specifically, the prohibition of child and forced labor, and the exclusion from their business activities of any product or service that labor, environmental, and occupational safety and health requirements that apply.	1. Updated Local Supplier Development Plan.	1. Within the first 6 months following the first disbursement.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Water Consumption	1. Develop an adaptive management Early Warning System for environmental protection that defines: (i) the conditions that trigger a warning; (ii) alert thresholds for sensitive components, including the levels and properties of surface and groundwater, key components of biodiversity, and priority ecosystem services; and (iii) response plans that describe the actions to be taken when each alert is triggered.	1. Early Warning System.	1. Within the first 6 months following the first disbursement.
		2. Implement the Early Warning System	2. Evidence of its implementation.	2. As part of ESCR.
PS 4: Community Health and Safety				
4.1	Infrastructure and Equipment Design and Security	1. For each building and facility at the Project's CP2 site (where required), submit a certification issued by a qualified professional stating that: (i) they were constructed in accordance with the approved life safety and fire protection system ("LSFPS") design; (ii) all LSFPS devices were installed in accordance with the design; and (iii) all LSFPS devices were tested in accordance with international regulatory requirements.	1. LSFPS certification for each building and facility at the Project's CP2 site.	1. 15 days prior to the commencement of operation or occupancy of each building and facility at the Project's CP2 site.
4.2	Emergency Preparedness and Response	1. Update the Emergency Response Plans ("ERP") for each phase (CP1 and CP2) of the Project to include: (i) a procedure for identifying potential impacts on local communities resulting from Project activities; (ii) a mechanism to make the ERPs accessible to neighboring communities so that they are prepared before, during, and after emergencies; and (iii) a procedure for reporting any incident or accident.	1. Updated ERPs for each phase of the Project.	1. Within the first 3 months following the first disbursement.
PS 6: Conservation of Biodiversity and Natural Habitats				
6.1	Protection and conservation of biodiversity	1. Update the Critical Habitat Assessment ("CHA") to include recently identified lizard species (<i>Liolaemus</i>) and Extremophile Microbial Ecosystems ("EMEs").	1. Updated CHA.	1. Within the first 4 months following the first disbursement.
		2. Update the Critical Biodiversity Impact Assessment ("CBIA") to include (a) CP2 activities that pose risks and impacts to flamingo species and (b) the results of the updated RCIA.	2. Updated CBIA.	2. Within the first 4 months following the first disbursement.

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		3. Update the Residual Biodiversity Impact Assessment ("RBIA") using the most recent results of the analysis of the most likely brine extraction scenarios and hydrogeological modeling, including their impacts on sensitive species (flamingos and EMEs), ecosystems, and ecosystem services.	3. Updated RBIA.	3. Within the first 4 months following the first disbursement.
		4. Update the Biodiversity Action Plan ("BAP") for the <i>upstream</i> site to include measures to (a) manage the impacts identified in the updated CBIA and RBIA and (b) ensure a net gain in critical habitat, or no net loss of natural habitat; and KPIs for each mitigation measure and taxonomic group.	4. Updated BAP.	4. Within the first 6 months following the first disbursement.
		5. Update the Biodiversity Monitoring and Evaluation Plan ("BMEP") for the <i>upstream</i> site, adjusting efforts and incorporating new protocols for monitoring EMEs and tracking the BAP's KPIs.	5. Updated BMEP.	5. Within the first 8 months following the first disbursement.
6.2	Invasive Alien Species	1. Develop an Invasive Alien Species Management Plan for the <i>upstream</i> site that includes, among other measures, the following to control the entry of cargo and food into its camps: (i) inspection at the points of loading and unloading; (ii) declaration to the health authority at the ports of origin and destination (as applicable); (iii) verification of transport in inert, sturdy, clean, and well-sealed sealed; avoid, to the extent possible, the use of wooden packaging; (iv) inspection of the condition of the products (sanitary or phytosanitary status, cleanliness levels, composition, presence of seeds, insects, or other organisms or microorganisms); and (v) use of the sanitary or phytosanitary guide to verify a satisfactory inspection at the port of origin (as applicable).	1. Invasive Alien Species Management Plan for the <i>upstream</i> site.	1. Within the first 4 months following the first disbursement.
		2. Implement the Invasive Alien Species Management Plan.	2. Evidence of its implementation.	2. As part of ESCR.
6.3	Ecosystem Services Management	1. Based on the results of the informed consultation and participation process ("ICP") with the indigenous communities and small-scale ranchers of Catamarca, update the Ecosystem Services Assessment ("SSEE").	1. Updated SSEE for the <i>upstream</i> site of the Project.	1. Within the first 4 months following the first disbursement.
		2. Include, in the updated BAP for the Project's <i>upstream</i> site, the proposed measures to manage the potential impacts on the identified SSEE.	2. BAP detailing the measures to manage potential impacts on the SSEE	2. Within the first 4 months following the first disbursement.
PS 7: Indigenous Peoples				
7.1	Mitigation and Development Benefits	1. Develop an Indigenous Peoples' Plan that includes: (i) a summary of the Project's consultation and participation activities with indigenous peoples; (ii) measures to manage the potential impacts identified in the impact assessment; (iii) a summary of the Project's agreements with Indigenous Peoples; and (iv) a description of the social investment programs planned by the Project for Indigenous Peoples.	1. Indigenous Peoples' Plan.	1. Within the first 6 months following the first disbursement.
		2. Implement the Indigenous Peoples' Plan.	2. Evidence of its implementation.	2. As part of ESCR.
PS 8: Cultural Heritage				
8.1	Protection of Cultural Heritage in Project Design	1. Develop a Cultural Heritage Management Plan, based on existing Archaeological Contingency Plans, to include: (i) procedures for consulting with local communities regarding their cultural heritage that could be affected by the Project; (ii) measures to protect tangible cultural heritage sites (e.g., archaeological sites); (iii) archaeological monitoring procedures; (iv) procedures	1. Cultural Heritage Management Plan.	1. Within the first 6 months following the first disbursement.

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		for handling chance finds; and (v) procedures to train community members involved in land-disturbing activities to identify cultural heritage and follow procedures for handling chance finds.		
		2. Implement the Cultural Heritage Management Plan.	2. Evidence of its implementation.	2. As part of ESCR.