

ENA Norte: Optimization of the Capital Structure and Investments in the North Corridor – Panama
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	Environmental and Social Management System	1. Document the Environmental and Social Management System (“ESMS”) specific to the Project, based on current corporate environmental and social policies.	1. ESMS Manual.	1. Within 180 days of the first disbursement.
		2. Adopt the Project’s ESMS.	2. Evidence of ESMS implementation.	2. As part of the Annual Environmental and Social Compliance Report (“ESCR”).
		3. Evaluate the implementation of the ESMS.	3. ESMS evaluation report.	3. As part of the ESCR.
1.3	Policy	1. Document the Environmental Policy that reaffirms the environmental commitments already in place in the Concessionaire’s operations.	1. Environmental Policy.	1. Within 120 days following the first disbursement.
		2. Adopt the Environmental Policy.	2. Evidence of having adopted the policy.	2. As part of the ESCR.
1.4	Emergency Preparedness and Response	1. Based on existing emergency protocols, update, formalize, and implement the Emergency Response Plan (“ERP”) for the Project, which shall include, as applicable: (i) a climate risk analysis and response procedures; (ii) requirements for the formation of response teams; (iii) a list of contacts and communication systems and protocols; (iv) procedures for interacting with local and regional authorities regarding health and emergency management; (v) a list and the locations of permanent emergency facilities and equipment for addressing these natural hazards; (vi) diagrams of evacuation routes and assembly points; (vii) a description and schedules for training exercises and drills, including, where applicable based on the nature of the activity, external stakeholders (e.g., communities and neighboring facilities); (viii) annual training programs; (ix) procedures for conducting root-cause analyses of any serious accident or fatality; and (x) a description of the corrective actions necessary to minimize the risk of future incidents.	1. Updated Emergency Response Plan for the Project.	1. Within 120 days following the first disbursement and thereafter as part of the ESCR
		2. Implement the Project-specific ERP.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Based on the response measures already included in the current Environmental Management Plans, adopt an Environmental Contingency Plan (“ECP”) for the Project, containing guidelines for response and restoration in the event of environmental emergencies (accidental spills or releases of pollutants or hazardous substances).	3. Project-specific ECP.	3. Within 120 days following the first disbursement.
		4. Implement the Project-specific ECP.	4. Evidence of implementation.	4. As part of the ESCR.

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1.5	Monitoring and Evaluation	1. Develop a Project-specific Monitoring Plan that integrates the monitoring activities the Concessionaire already carries out in accordance with the current EIA and PAMA and that includes: (i) a schedule for monitoring and field inspections; (ii) details on monitoring frequencies; (iii) a timeline and list of environmental parameters to be assessed; (iv) the location of monitoring sites; (v) a description of data collection methods; (v) data management and evaluation procedures; and (vi) protocols for preparing reports summarizing the main findings.	1. Project-specific Monitoring Plan.	1. Within 120 days following the first disbursement.
		2. Implement the Project-specific Monitoring Plan.	2. Evidence of implementation.	2. As part of the ESCR.
1.6	Grievance Mechanism for Affected Communities	1. Update the Document Tracking Procedure to include, as applicable: (i) objectives; (ii) responsibilities and scope; (iii) principles and types of complaints and claims, including those of an anonymous nature; (iv) mechanisms for identifying and receiving complaints and claims while maintaining confidentiality; (v) protocols for recording, investigating, and resolving complaints and claims; (vi) requirements for publicizing the procedure; and (vii) provisions to prevent retaliation or discrimination against individuals who use the procedure.	1. Updated Document Tracking Procedure.	1. Within 120 days following the first disbursement.
ND 2: Labor and Working Conditions				
2.1	Grievance Mechanism	1. Expand the existing internal grievance mechanism ("IGM") so that: (i) it incorporates various forms to capture workers' complaints and claims through additional channels (email, the website, the employee portal, or a dedicated hotline) in addition to those already in place; (ii) it guarantees anonymity (when requested) and confidentiality; (iii) prohibits any form of retaliation against those who use it; and (iv) provides information about the case to the competent authorities should they initiate any labor-related investigation.	1. Expanded internal complaint-handling mechanism.	1. Within 120 days of the signing of the loan agreement.
		2. Implement the IGM.	2. Evidence of implementation.	2. As part of the ESCR.
2.2	Supply Chain	1. Update the Procurement Regulations in accordance with the contracting regime applicable to the Concessionaire so that, in addition to regulating the acquisition of materials, equipment, and services, they explicitly reaffirm the Concessionaire's commitment to: (i) ensuring safe working conditions; (ii) minimizing environmental pollution; (iii) promoting the rational use of natural and energy resources; (iv) require suppliers to comply with Panama's labor and occupational health and safety ("OHS") standards; and (v) when necessary, allow the imposition of sanctions on suppliers that fail to comply with these principles.	1. Updated Procurement Regulations.	1. Within 120 days following the first disbursement.
		2. Adopt the Procurement Regulations.	2. Evidence of adoption.	2. As part of the ESCR.

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ND 3: Efficient Use of Resources and Pollution Prevention				
3.1	Greenhouse Gases ("GHG")	1. Prepare an Annual Scope 1 and 2 GHG Emissions Inventory for the Operations and Maintenance ("O&M") of the Project that: (i) includes sources under the Concessionaire's operational control; and (ii) explains the variations detected compared to the base year.	1. Annual GHG Emissions Inventory.	1. As part of the ESCR.
		2. Develop a methodology for accounting for Scope 3 GHG emissions associated with the transportation of services contracted from third parties under the Concessionaire's operational control.	2. Methodology for accounting for Scope 3 GHG emissions.	2. Along with the first Annual GHG Emissions Inventory.
		3. Adopt the methodology to incorporate Scope 3 into the Annual GHG Emissions Inventory, to the extent that the necessary information is reasonably available.	3. Evidence of adoption.	3. As part of the ESCR.
ND 4: Community Health and Safety				
4.1	Infrastructure and Equipment Design and Safety	1. If the Project involves the construction of new facilities or the expansion or improvement of existing facilities that are required to implement such measures in accordance with Fire Department requirements, submit certificates issued by professionals in life safety and fire protection systems ("L&FS") attesting that such facilities: (i) have been constructed in accordance with approved L&FS designs; (ii) are equipped with systems installed in accordance with L&FS designs; and (iii) have L&FS systems that have been tested in accordance with international requirements.	1. Certification of the fire protection system.	1. As part of the ESCR, where applicable.