

Environmental and Social Action Plan (ESAP)

No.	Reference	Measure	Final Product/Deliverable	Expected Completion Date	Status
PS 1: Assessment and Management of Environmental and Social Risks and Impacts					
1.1	Environmental and Social Management System (ESMS)	1. Evaluate the Environmental Management System (EMS) of each CMI SBU based on the IFC Environmental and Social Management System (ESMS) Implementation Manual and Tools	1. EMS evaluation report for each SBU.	1. Three months after the signing of the loan agreement or before the second disbursement, whichever comes first.	Complete
		2. Update and enhance any element of a CMI SBU EMS with a low level of maturity or evolution (below 3.0)	2. Copy of each SBU's EMS, updated and enhanced.	2. Six months after the signing of the loan agreement or before the second disbursement, whichever comes first.	In progress
1.2	Environmental, Social, and Occupational Health and Safety Policy	1. Develop a procedure to implement and communicate the updated integrated policy at all levels of the CMI-IP.	1. Copy of the Implementation and Communication Procedure.	1. Four months after the signing of the loan agreement or before the second disbursement, whichever comes first.	Complete
		2. Create a mechanism to measure and communicate continuous improvements upon implementation of the updated CMI-IP integrated policy.	2. Copy of the mechanism.	2. Four months after the signing of the loan agreement or before the second disbursement, whichever comes first.	Complete
1.3	Monitoring and assessment indicators	1. Develop a set of key performance indicators ("KPIs") for each compliance matrix in each CMI SBU operating center, in order to measure the effectiveness of the EMS and ESMP.	1. Copy of the set of KPIs in each CMI SBU.	1. Six months after the signing of the loan agreement or before the second disbursement, whichever comes first.	Complete
		2. Develop an Annual Training Program for each CMI SBU to obtain and measure KPIs and implement a continuous	2. Copy of the Annual Training Program and the continuous	2. Six months after the signing of the loan agreement or before the	In progress

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		improvement procedure, outlining the corrective actions needed to comply with the KPIs.	improvement procedure for each CMI SBU.	second disbursement, whichever comes first.	
1.4	Project's Regulatory Compliance	1. Prepare a consolidated annual report on the compliance status with all environmental, social, and OHS policies and measures applicable to the Project, either through an internal audit or through an external independent environmental and social expert (external audit). This must include progress reports on SASA actions and the defined KPIs, as well as the compliance status with the IDB Invest Environmental and Social Sustainability Policy.	1. Environmental and social compliance report.	1. Annually over the life of the loan.	In progress
PS 2: Labor and Working Conditions					
2.1	Internal Grievance Mechanism	1. Develop an Annual Training Program and regular dissemination campaigns for the CMI Te Escucha initiative involving all partners and personnel, including contractors and subcontractors, and their staff.	1. Copies of the Annual Training Program.	1. Three months after the signing of the loan agreement or before the second disbursement, whichever comes first.	Complete
		2. Adopt and maintain the Annual Training Program.	2. Copies of proof of its implementation.	2. Progress report in each environmental and social compliance report.	In progress