

Merqueo Mezz Project – COLOMBIA, MEXICO and BRAZIL
Environmental and Social Action Plan (ESAP)

No.	Aspect	Action	Deliverable	Delivery date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Environmental and Social Management System	1. Consolidate and approve the IMS for Mexico and Brazil, replicating and adapting the applicable components of the Colombian IMS.	1. The approved IMS Manual for Mexico. 2. The approved IMS Manual for Brazil.	1. Six months after financial closure. 2. Nine months after financial closure.
1.2	Identification of Risks and Impacts	1. Prepare an Environmental Aspects and Impacts Matrix for operations in Mexico and Brazil.	1. Environmental Aspects and Impacts Matrix for operations in Mexico and Brazil.	1. Three months after financial closure.
1.3	Management Programs	1. Prepare an E&S and OHS Work Plan for Mexico and Brazil.	1. E&S and OHS Work Plan for Mexico. 2. E&S and OHS Work Plan for Brazil.	1. Four months after financial closure. 2. Six months after financial closure.
1.4	Emergency Preparedness and Response	1. Prepare an Emergency Plan for all offices in operation in Mexico and Brazil, to include all aspects set out in the Emergency Master Plan (identification of internal and external hazards, hazard vulnerability analysis and risk assessment).	1. Emergency Plan for the offices in operation in Mexico and Brazil.	1. Three months after financial closure.
		2. Prepare an Emergency Plan for all offices to be established in Mexico and Brazil, to include all aspects set out in the Emergency Master Plan (identification of internal and external hazards, hazard vulnerability analysis and risk assessment).	2. Emergency Plan for all new offices in Mexico and Brazil.	2. Two months after opening each new office.
		3. Prepare Drill Plans for all offices in Mexico and Brazil.	3. Drill Plans for all offices in Mexico and Brazil.	3. Six months after financial closure.
		4. Implement drills in all premises in Mexico and Brazil.	4. Records of drills carried out in the Mexico and Brazil offices.	4. Fourteen months after financial closure.
1.5	Monitoring and Review	1. Prepare the Monitoring Plan for Mexico and Brazil, covering all risk areas and including: indicators, procedures, responsibilities for recording, analyzing and reporting results, and procedures for handling non-conformities.	1. Monitoring Plan for Mexico and Brazil.	1. Six months after financial closure.
1.6	Stakeholder Engagement	1. Implement the Ethics Line in Brazil.	1. Proof of the adoption and registration of the Ethical Line.	1. Six months after the first disbursement, and then as part of the Environmental and Social Compliance Report (ESCR).
PS 2: Labor and Working Conditions				
2.1	Human Resources Policies and Procedures	1. Prepare and validate Brazil's "Internal Labor Regulations" based on local legislation.	1. Internal Labor Regulations for Brazil.	1. Three months after financial closure.
2.2	Human Resources Policies and Procedures	1. Consolidate and adapt for Mexico and Brazil the protocol that consolidates and drives the relationship with transportation service providers, defining their responsibilities, roles, payment methods, penalties, code of conduct, grievance mechanism and regulations.	1. Relationship protocol with independent transportation service providers.	1. Four months after financial closure.

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		2. Incorporate the protocol into Mexico's and Brazil's IMSs.	2. IMS Manual for Mexico and Brazil.	2. Six months after financial closure.
		3. Disseminate the protocol in Mexico and Brazil.	3. Protocol dissemination record.	3. Nine months after financial closure, and then as part of the ESCR.
2.3	Human Resources Policies and Procedures	1. Consolidate and adapt the "Industrial Hygiene and Safety Regulations" for Mexico and Brazil.	1. Industrial Hygiene and Safety Regulations for Mexico and Brazil.	1. Six months after financial closure.
		2. Disseminate the Regulations among collaborators and contractors in Mexico and Brazil.	2. Record of dissemination of the Regulations among collaborators and contractors in Mexico and Brazil.	2. Nine months after financial closure.
		3. Consolidate and adapt the "Policy for the Prevention of the Consumption of Alcohol, Tobacco, Psychoactive Substances and the Carrying of Weapons" for Mexico and Brazil.	3. Policy for the Prevention of the Consumption of Alcohol, Tobacco, Psychoactive Substances and the Carrying of Weapons for Mexico and Brazil.	3. Six months after financial closure.
		4. Disseminate the Policy among collaborators and contractors in Mexico and Brazil.	4. Record of dissemination of the Policy among collaborators and contractors in Mexico and Brazil.	4. Nine months after financial closure.
2.4	Grievance Mechanism	1. Consolidate and adapt the employee "Grievance Mechanism" for Mexico and Brazil, including the possibility of receiving anonymous complaints.	1. Employee Grievance Mechanism for Mexico and Brazil.	1. Two months after financial closure.
		2. Disseminate the mechanisms among employees in Mexico and Brazil.	2. Record of dissemination of the mechanisms among employees in Mexico and Brazil.	2. Three months after financial closure.
		3. Adopt the "Declaration of Non-Retaliation" in Colombia, Mexico and Brazil.	3. "Declaration of Non-Retaliation" in Colombia, Mexico and Brazil.	3. Two months after financial closure.
		4. Disseminate the Declaration among employees in Colombia, Mexico and Brazil.	4. Record of dissemination of the Declaration among employees in Colombia, Mexico and Brazil.	4. Three months after financial closure.
2.5	Occupational Health and Safety	1. Consolidate the "Work Environment Monitoring Plan" for Mexico, considering exposure to carbon monoxide, noise, lighting and temperature, and in accordance with local legislation.	1. "Work Environment Monitoring Plan" for Mexico.	1. Three months after the first disbursement.
		2. Monitor the execution of the plan.	2. Monitoring reports.	2. Six months after the first disbursement, and then as part of the ESCR.
2.6	Supply Chain	1. Develop and implement the "Supplier and Contractor Management Procedure" for Mexico and Brazil, adapting aspects of the Colombian Procedure, in accordance with local legislation.	1. "Supplier and Contractor Management Procedure" for Mexico and Brazil.	1. Six months after financial closure.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Resource Efficiency	1. Develop energy efficiency and water use projects for Mexico and Brazil.	1. Energy efficiency and water use projects for Mexico and Brazil.	1. Six months after financial closure.
		2. Implement the project.	2. Proof of implementation in Mexico and Brazil.	1. Twelve months after financial closure, and then as part of the ESCR.

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3.2	Greenhouse Gases	1. Calculate the carbon footprint based on data collected in 2021 in Mexico and Brazil.	1. Calculation of the carbon footprint for 2021 in Mexico and Brazil.	1. Six months after financial closure.
		2. Implement the Tree Planting Mitigation Program in Colombia, Mexico and Brazil.	2. Mitigation Program implementation report in Colombia, Mexico and Brazil.	2. Twelve months after financial closure, and then as part of the ESCR.
3.3	Pollution Prevention	1. Include the identification of hazardous waste generated by operations in Mexico's "Integrated Waste Management Plan", taking into account its management, prevention and minimization.	1. Integrated Waste Management Plan updated.	1. Four months after the first disbursement.
PS 4: Community Health, Safety, and Security				
4.1	Community Health and Safety	1. Prepare a "Comprehensive Road Safety Policy" for Mexico and Brazil.	1. Comprehensive Road Safety Policy for Mexico. 2. Comprehensive Road Safety Policy for Brazil.	1. Six months after financial closure. 2. Nine months after financial closure.
4.2	Community Health and Safety	1. Prepare a "General Protocol for Road Accident Response" for Mexico and Brazil.	1. General Protocol for Road Accident Response for Mexico. 2. General Protocol for Road Accident Response for Brazil.	1. Six months after financial closure. 2. Nine months after financial closure.
4.3	Security Personnel	1. Incorporate minimum requirements for security service providers into Mexico's and Brazil's "Supplier and Contractor Management Procedures" to ensure that security personnel have all legally required permits to carry firearms, undergo background checks and get training.	1. Supplier and Contractor Management Procedures for Mexico and Brazil.	1. Six months after the first disbursement.