

**One Communications (Guyana) Inc Long-term Financing
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	Compliance with National Regulations	1. Prepare a matrix with all required environmental licenses, permits, and approvals, including their reporting requirements and implementation status	1. Matrix detailing all environmental licenses, permits and approvals	1. Prior to 1 st disbursement
		2. Submit a list valid or updated operational licenses and permits	2. List of valid permits and licenses	2. Prior to 1 st disbursement
		3. Implement all environmental requirements contained in the corresponding permits, licenses and approvals including annual EPA monitoring reports	3. Proof of implementation	3. As part of the Environmental and Social Compliance Report (ESCR)
1.2	Environmental and Social Management System (ESMS)	1. Prepare an ESMS that includes: i) an E&S policy; ii) a matrix identifying potential E&S and OHS risks and impacts (including cumulative impacts), as well as associated control measures (including Chance Find Procedures); iii) management procedures to (a) prevent, mitigate or compensate any undesired E&S impact and OHS risk (as identified in the matrix), and (b) fulfill requirements contained in environmental permits; iv) an organigram of E&S staff and training schedules on E&S management; v) an emergency preparedness and response plan, that includes, among other requisites (a) the identification of relevant emergency situations (including both natural and man-made disasters), (b) response procedures for each category, (c) details of emergency equipment and maintenance, (d) the list of designated personnel and focal points, (e) a scheme of evacuation routes and meeting points, (f) a list of emergency contacts communication flowchart, (g) a training schedule, and (h) procedures for periodic review; vi) a stakeholder engagement plan (SEP), including vulnerable groups, and ongoing consultation and reporting; vii) internal and external grievance handling procedures; viii) environmental audit procedures; and ix) a schedule to monitor effectiveness of the ESMS.	1. Finalized ESMS	1. 9 months after 1 st disbursement
		2. Train staff on ESMS	2. Training report	2. As part of the ESCR
		3. Implement the ESMS	3. ESMS reports	3. As part of the ESCR
1.3	Emergency Preparedness and Response (EPR)	1. Submit EPR and Business Continuity Plans	1. Copies of the EPR and Business Continuity Plans	1. Prior to 1 st disbursement
1.4	Organizational Capacity and Competency	1. Identify E&S focal point for the Project including roles and responsibilities	1. E&S focal designation with job description Tiana to look at this.	1. Prior to 1 st disbursement
		2. Designate a Community Relations Officer (CRO)	2. Proof of CRO designation	2. Prior to 1 st disbursement
1.5	External communications and grievance management	1. Update website customer portal	1. Updated portal	1. 3 months after 1 st disbursement
		2. Present monitoring report on portal usage interface including customer feedback and resolutions	2. Monitoring Report	2. 6 months after 1 st disbursement and thereafter as part of the ESCR
		3. Prepare grievance tracking matrix for claims received via EPA	3. Grievance matrix	3. As part of ESCR
1.6	Identification of risks and impacts	1. Submit checklist of anticipated work locations including maps and works to be undertaken	1. Works checklist	1. Prior to 1 st disbursement for scheduled works, and prior to order to proceed or start of works

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PS 2: Labor and Working Conditions				
2.1	Human Resource Policies and Procedures	1. Update Employee Handbook which will include aspects such as: i) terms of employment (including freedom of association); ii) non-discrimination and equal opportunity; iii) policy on drug and alcohol-free workplace; iv) explicit declarations of zero tolerance towards sexual harassment and gender-based violence; and v) provisions against the use of child and forced labor	1. Updated Employee Handbook	1. 6 months after 1 st disbursement
		2. Disseminate the updated Employee Handbook to all employees	2. Proof of dissemination	2. 9 months after 1 st disbursement
		3. Train all employees on the updated Employee Handbook	3. Training reports	3. As part of the ESCR
2.2	Internal Grievance Mechanism	1. Prepare a revised internal grievance procedure that includes a description on: i) the specific channels for grievance reception; ii) teams responsible for grievance reception, assessment, and response; iii) expected timing of response; iv) an anti-reprisal policy; and v) identity protection procedures (i.e., confidentiality, anonymity, sexual harassment, etc.)	1. Revised Grievance Mechanism Document	1. 1 month after 1 st disbursement
		2. Disseminate revised Grievance Mechanism Document	1. Evidence of dissemination	2. 3 months after 1 st disbursement
		3. Maintain grievance register to capture reports	2. Grievance register	3. As part of the ESCR
2.3	Occupational Health and Safety	1. Present report on learning management system (LMS) specifying training materials and courses for employees	1. LMS Report	1. Prior to 1 st disbursement
		2. Submit Health and Safety (H&S) Assessment	2. H&S Assessment	2. Prior to 1 st disbursement
		3. Implement recommendations from H&S Assessment	3. Evidence of Implementation	3. 1 month after 1 st disbursement
		4. Update the H&S Policy to reflect measures (in particular for field offices, employees and contractors) regarding: i) working at heights and fall protection; ii) confined spaces; iii) motor vehicle safety; iv) optical fibre safety; v) electrical safety; vi) adverse weather conditions; and vii) first aid response	4. Updated H&S policy	4. 6 months after 1 st disbursement
		5. Disseminate H&S Policy to employees	5. Evidence of dissemination	5. 9 months after 1 st disbursement
		6. Prepare a hazard identification matrix as part of the ESMS which will also include i) risk assessment and classification of these hazards; ii) special permissions and procedures for high-risk work; iv) regular monitoring of H&S indicators; iv) employees safety training plan; vi) step-by-step procedures for reporting accidents including root cause analysis; and vii) detailed accident investigation procedures (including emergency contact information).	6. Hazard assessment	6. 6 months after 1 st disbursement
		7. Conduct OHS training based on H&S Policy and hazard assessment (including drills for emergency response)	7. Training and drill reports	7. As part of the ESCR
		8. Submit H&S statistics and root cause analysis for reported accidents	8. H&S statistics with root cause analysis	8. Prior to 1 st disbursement for 2023 period; and thereafter as part of the ESCR
2.4	Provisions for people with disabilities	1. Adopt a policy for people with disabilities.	1. Policy for people with disabilities	1. 6 months after 1 st disbursement
2.5	Workers Engaged by Third Parties	1. Submit status report on Enterprise Spend Management (ESM)	1. Status report	1. 3 months after 1 st disbursement, and thereafter as part of ESCR until formal implementation

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		2. Submit contract templates reflecting that contractors and sub-contractors are bound to company's HR, Code of Ethics, antidiscrimination, H&S, and environmental policies and procedures	2. Copies of the contracts	2. 1 month after 1st disbursement
2.6	Supply Chain	1. Update procurement procedure and policies to incorporate parent company's Sustainability Compliance Standards to ensure that no child or forced labor is used along supply chain	1. Updated Procurement Policy	1. 3 months after 1st disbursement
		2. Communicate revised procedure and policy to third parties (contractors and sub-contractors)	2. Evidence of communication to third parties	2. 6 months after 1st disbursement
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Resource Efficiency	1. Submit energy consumption data	1. Consumption data	1. As part of the ESCR
3.2	Waste Management (including hazardous waste)	1. Conduct a waste audit for operations covering all categories of waste	1. Waste Audit	1. 9 months after 1st disbursement
		2. Prepare Operational Waste Management Plan (OWMP) based on audit to manage all waste streams (solid, liquid, hazardous, non-hazardous)	2. OWMP	2. 9 months after 1st disbursement
		3. Implement OWMP	3. Evidence of implementation	3. As part of the ESCR
3.3	Pesticide Use and Management	1. Include measures and guidelines regarding appropriate pesticide use and management in H&S policy	1. H&S Policy with pest management guidelines	1. 6 months after 1st disbursement
PS 4: Community Health, Safety, and Security				
4.1	Community Health and Safety	1. Outline steps to manage general exposure risk to relevant communicable disease or other illness (including Sexually Transmitted Infections ("STI's") and vector-borne diseases), as part of updated H&S policy	1. H&S Policy with disease exposure management provisions.	1. 6 months after 1st disbursement
		2. Conduct ongoing training for employees and contractors	2. Training reports	2. As part of the ESCR
4.2	Infrastructure and Equipment Design and Safety	1. Present an implementation report on existing fire safety measures for offices, stores and manned locations detailing: i) fire drills to date; ii) evacuation and assembly points; iii) fire marshals and training; and iv) fire suppression systems and fire extinguishers.	1. Implementation Report	1. Prior to 1st disbursement
		2. Submit recent annual inspection reports from Guyana Fire Service & Guyana Energy Agency (GEA)	2. Inspection reports	2. Prior to 1st disbursement
		3. Conduct safety audit for all operations (including its offices and stores)	3. Safety Audit	3. 9 months after 1st disbursement
		4. Implement recommendations from audit	4. Evidence of implementation	4. As part of the ESCR
		5. Submit relevant training and drill reports	5. Training and drill reports	5. As part of the ESCR
4.3	Security Personnel	1. Submit a Security Screening Assessment	1. Security Screening Assessment	1. 3 months after 1st disbursement
		2. Present evidence of annual training regarding relevant policies (e.g., code of conduct, use of drugs and alcohol in the workplace).	2. Training reports	2. As part of the ESCR