

**PROJECT QMC - REGIONAL FACILITY**  
**Environmental and Social Action Plan (ESAP)**

No.	Aspect	Action	Deliverable	Delivery date
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>				
1.1	Environmental and Social Management System (ESMS)	<ol style="list-style-type: none"> <li>Prepare an ESMS containing: (i) policy; (ii) identification of risk, impacts and mitigation measures; (iii) environmental and social management programs and procedures; (iv) organizational capacity and competency (including training); (v) emergency preparedness and response; (vi) stakeholder engagement process; (vii) monitoring and review; (viii) procedures for solid and liquid waste management; (ix) emergency preparedness and response; (x) noise monitoring during construction; and (xi) social communication process (including consultation during project development, construction, and operation of telecom facilities).</li> <li>Prepare contractual provisions to ensure that third-party contractors adopt all ESMS procedures as contractual obligations.</li> <li>Provide formal training for workers and third-party contractors on ESMS procedures and obligations.</li> <li>Consistent with country regulations, ensure that all requirements for the essential permits are met prior to the start of construction.</li> <li>Report on the results of ESMS, permitting Key Performance Indicators (KPIs), deviations and improvement opportunities.</li> </ol>	<ol style="list-style-type: none"> <li>Copy of the ESMS.</li> <li>Copy of third-party contract.</li> <li>Report on training of workers and third-party contractors.</li> <li>List of permits issued to each new site built.</li> <li>Report on ESMS results, PKI, deviations, and Improvement opportunities.</li> </ol>	<ol style="list-style-type: none"> <li>Six months after first disbursement.</li> <li>Six months after first disbursement.</li> <li>Seven months after first disbursement.</li> <li>Yearly after first disbursement as part of the Environmental and Social Compliance Report (ESCR).</li> <li>Yearly after first disbursement as part of the ESCR.</li> </ol>
1.2	Identification of Risks and Impacts	<ol style="list-style-type: none"> <li>Prepare a procedure to screen proposed sites to assess whether they are inserted into Conservation Units, Natural Protected Areas, Cultural Heritage Sites and Designated Land for the protection of vulnerable communities or other restricted areas before deciding on site location.</li> <li>Report on site selection process for each country.</li> </ol>	<ol style="list-style-type: none"> <li>Screening Procedure.</li> <li>Report on site location.</li> </ol>	<ol style="list-style-type: none"> <li>Three months after first disbursement.</li> <li>Yearly after first disbursement as part of the ESCR.</li> </ol>
1.3	Stakeholder Engagement	<ol style="list-style-type: none"> <li>Create a specific grievance mechanism to receive complaints from external members of the public and maintain the existing grievance channel for workers and contractors.</li> <li>Disseminate the mechanism in all country offices and during public meetings linked to telecom projects in all countries covered by the Project.</li> <li>Report on both internal and external grievances.</li> </ol>	<ol style="list-style-type: none"> <li>Copy of the grievance mechanism.</li> <li>Report on dissemination of grievance mechanism.</li> <li>Report on both internal and external grievances</li> </ol>	<ol style="list-style-type: none"> <li>Three months after first disbursement.</li> <li>Yearly after first disbursement as part of the ESCR.</li> <li>Yearly after first disbursement as part of the ESCR.</li> </ol>
<b>PS 2: Labor and Working Conditions</b>				
2.1	Occupational Health and Safety	<ol style="list-style-type: none"> <li>Prepare a Health &amp; Safety Management Plan (HSMP) for use by the Company, third-party contractors and subcontractors in all countries that contains: (i) identification of potential hazards of construction and operations of telecom sites to workers, (ii) provision of preventive and protective measures to workers tailored to the hazards of operations, (iii) training of workers on health and safety, (iv) documentation and reporting of occupational accidents, incidents and diseases, (v) documentation on emergency prevention, preparedness and response.</li> <li>Establish contractual provisions to ensure that third-party contractors adopt all HSMP procedures.</li> <li>Provide formal training for workers and third-party contractors on HSMP procedures and obligations.</li> </ol>	<ol style="list-style-type: none"> <li>HSMP.</li> <li>Copy of contractual obligations for third parties to adhere to HSMP procedures.</li> <li>Report on training of workers and third-party contractors.</li> <li>Report on results</li> </ol>	<ol style="list-style-type: none"> <li>Six Months after first disbursement.</li> <li>Six months month after first disbursement.</li> <li>Yearly after first disbursement as part of the ESCR.</li> <li>Yearly after first disbursement as part of the ESCR.</li> </ol>

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		4. Present the results of HSMP, Key Performance Indicators (KPIs), deviations and improvement opportunities.		
2.2	Workers Engaged by Third Parties	<ol style="list-style-type: none"> <li>1. Prepare a Third-party Engagement Policy to ensure that contractors, subcontractors, and other service and goods suppliers comply with all national regulations on employment, work safety, and QMC's ESMS and HSMP.</li> <li>2. Disseminate the Policy by means of the company's existing communication channels.</li> <li>3. Include in the third-party contracts (contractors and subcontractors) the necessity of compliance with the Policy.</li> </ol>	<ol style="list-style-type: none"> <li>1. Third-party Engagement Policy.</li> <li>2. Report on Third-Party Engagement Policy dissemination.</li> <li>3. Copy of the contract template.</li> </ol>	<ol style="list-style-type: none"> <li>1. Six months after first disbursement.</li> <li>2. Yearly after first disbursement as part of the ESCR.</li> <li>3. Four months after first disbursement.</li> </ol>
2.3	Human Resources Policy and Procedures	<ol style="list-style-type: none"> <li>1. Prepare a Human Resources Policy and procedures covering employment conditions and benefits, job descriptions, pay grades, onboarding and offboarding procedures, diversity and inclusion, and other relevant issues.</li> <li>2. Disseminate the policy in all countries where the Company operates.</li> <li>3. Apply the policy in all countries where the Company operates.</li> </ol>	<ol style="list-style-type: none"> <li>1. Human Resources Policy.</li> <li>2. Evidence of policy dissemination.</li> <li>3. Evidence of policy adoption.</li> </ol>	<ol style="list-style-type: none"> <li>1. Six months after first disbursement.</li> <li>2. Yearly after first disbursement.</li> <li>3. Yearly after first disbursement.</li> </ol>
<b>PS 3: Resource Efficiency and Pollution Prevention</b>				
3.1	Pollution Prevention	<ol style="list-style-type: none"> <li>1. The Client will endeavor to obtain and present evidence from Telecom Companies of compliance with national regulations<sup>1</sup> regarding protection against Electromagnetic Fields for all new telecom infrastructure.</li> </ol>	<ol style="list-style-type: none"> <li>1. Documents from Telecom Companies ensuring compliance with national regulations.</li> </ol>	<ol style="list-style-type: none"> <li>1. Yearly after first disbursement as part of the ESCR.</li> </ol>
3.2	Solid Waste Management	<ol style="list-style-type: none"> <li>1. Prepare a Solid Waste Management procedure as part of the ESMS.</li> <li>2. Adopt the Solid Waste Management procedure.</li> <li>3. Present regular reports on solid waste management.</li> </ol>	<ol style="list-style-type: none"> <li>1. Solid Waste Management Procedure.</li> <li>2. Evidence of the adoption of Solid Waste Management Procedures for each country.</li> <li>3. Reports on solid waste management.</li> </ol>	<ol style="list-style-type: none"> <li>1. Six months after first disbursement.</li> <li>2. Seven months after first disbursement.</li> <li>3. Yearly after first disbursement as part of the ESCR.</li> </ol>
3.3	Effluent Management	<ol style="list-style-type: none"> <li>1. Prepare an effluent management procedure as part of the ESMS.</li> <li>2. Adopt the effluent management procedure.</li> <li>3. Present regular results on effluent management.</li> </ol>	<ol style="list-style-type: none"> <li>1. Effluent management procedure.</li> <li>2. Evidence of the adoption of the effluent management procedure or each country</li> <li>3. Reports on effluent management.</li> </ol>	<ol style="list-style-type: none"> <li>1. Six months after first disbursement.</li> <li>2. Seven months after first disbursement.</li> <li>3. Yearly after first disbursement as part of the ESCR.</li> </ol>
<b>PS 4: Community Health, Safety, and Security</b>				
4.1	Community Health and Safety	<ol style="list-style-type: none"> <li>1. As part of the stakeholder engagement process established in the ESMS, provide the community information on EMF associated with the equipment installed in the towers.</li> <li>2. Report on communication process, questions raised by community members and responses given by QMC regarding EMF.</li> </ol>	<ol style="list-style-type: none"> <li>1. Information materials used during community meetings.</li> <li>2. Report on community concerns.</li> </ol>	<ol style="list-style-type: none"> <li>1. Six months after first disbursement.</li> <li>2. Yearly after first disbursement as part of the ESCR.</li> </ol>
4.2	Noise nuisance	<ol style="list-style-type: none"> <li>1. Prepare a noise monitoring protocol to address sensitive receptors around telecom tower sites during construction.</li> <li>2. Carry out one noise monitoring campaign at sensitive receptors during project construction.</li> </ol>	<ol style="list-style-type: none"> <li>1. Noise monitoring procedure.</li> <li>2. Noise monitoring report.</li> <li>3. Noise management report.</li> </ol>	<ol style="list-style-type: none"> <li>1. Six months after first disbursement.</li> </ol>

<sup>1</sup> Consider existing national regulations for protection against electromagnetic fields in Mexico, Colombia, Peru, and Chile.

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		3. Adopt noise reduction measures as required to meet national and international standards.		2. Yearly after first disbursement as part of the ESCR. 3. Yearly after first disbursement as part of the ESCR.
4.3	Community exposure to disease	1. Prepare a procedure to detect and eliminate possible areas of water accumulation, subject to the reproduction of mosquitos ( <i>Aedes</i> spp.). 2. Report on mosquito reproduction sites removal and results obtained.	1. Inspection and removal of mosquito sources procedure. 2. Report on potential mosquito's sites reproduction removal and results.	1. One month after first disbursement. 2. Yearly after first disbursement as part of the ESCR.
4.4	Fire Safety	1. Hire expert consultant to assess international fire safety regulations and confirm the requirements for Life and Fire Safety Systems at Telecom Sites. 2. Prepare a plan for implementation of life and fire safety systems at all Telecom Sites. 3. Implement life and fire safety systems and equipment gradually.	1. Life and Fire Safety assessment report. 2. Life and Fire Safety Implementation Plan. 3. Report on the Life and Fire Safety Implementation Plan progress.	1. Six months after first disbursement. 2. Seven months after first disbursement. 3. Yearly after first disbursement as part of the ESCR.
<b>PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>				
6.1	Protection and Conservation of Biodiversity	1. Assess by means of a checklist, siting requirements for Telecom Infrastructure that are likely to result in the conversion of natural and critical habitats. 2. If applicable, prepare a Site-Specific Biodiversity Action Plan that includes mitigation, compensation, and offsets, as well as long-term biodiversity monitoring. 3. If applicable, adopt a Biodiversity Action Plan. 4. If applicable, report the actions under the Biodiversity Action Plan.	1. Report on the siting requirements assessment. 2. Biodiversity Action Plan (BAP). 3. Evidence of BAP adoption. 4. Report on the implementation of the BAP.	1. Three months after first disbursement. 2. Three months before the construction of any infrastructure in a biodiversity sensitive area. 3. Three months before the construction of any infrastructure in a biodiversity sensitive area. 4. Yearly after first disbursement as part of the ESCR.
<b>PS 7: Indigenous People</b>				
7.1	Avoidance of Adverse Impacts	1. If applicable, by means of a checklist, identify alternative telecom sites outside of indigenous communities. 2. If applicable, prepare a Site-specific Social Impact Assessment that includes: (i) a baseline describing affected indigenous or vulnerable communities; (ii) an assessment of impacts; (iii) the identification of mitigation and compensation measures; and (iv) a consultation process that includes national and local authorities, affected communities and other relevant stakeholders. 3. Report the results of checklist application and, if needed, social mitigation and compensation undertaken.	1. Procedure and checklist to perform alternatives assessment. 2. Site-specific Social Impact Assessment. 3. Report the results of checklist application and on any social mitigation and compensation measures that have been adopted.	1. Three months after first disbursement. 2. Three months before the construction of any infrastructure in an indigenous area. 3. Yearly after first disbursement as part of the ESCR.
<b>PS 8: Cultural Heritage</b>				

No.	Aspect	Action	Deliverable	Delivery date
8.1	Chance Find	<ol style="list-style-type: none"> <li>1. Prepare a chance find procedure.</li> <li>2. Adopt the chance find procedure</li> <li>3. Report on any archaeological or cultural finding by country.</li> </ol>	<ol style="list-style-type: none"> <li>1. Chance find procedure.</li> <li>2. Evidence of the adoption</li> <li>3. Report on archaeological or cultural findings.</li> </ol>	<ol style="list-style-type: none"> <li>1. Six months after first disbursement.</li> <li>2. Seven months after first disbursement.</li> <li>3. Yearly after first disbursement as part of the ESCR.</li> </ol>