

**VU Security – REGIONAL  
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	1. Develop an Environmental and Social Management System ("ESMS").	1. Environmental and Social Management System Manual.	1. Eight months after the first disbursement.
		2. Implement the ESMS.	2. Evidence of implementation.	2. As part of the Environmental and Social Compliance Report (ESCR).
1.2	Grievance Mechanism	1. Produce a grievance receipt mechanism that establishes, among other things, external communication channels, the Company personnel responsible for handling grievances, response times, and the registration of grievances received.	1. Grievance mechanism	1. Four months after the first disbursement.
		2. Implement the grievance mechanism.	2. Implementation reports.	2. Four months after the first disbursement and then as part of the ESCR.
		3. Include links to the Ethics Hotline and to download the Code of Ethics on the Company's website.	3. Link on the Website.	3. Prior to First Disbursement.
<b>PS 2: Labor and Working Conditions</b>				
2.1	Internal Work Regulations	1. Create Internal Work Regulations based on the national legislation of each country in which the Company has employees, which explicitly recognize employees' right to form labor unions.	1. Internal Work Regulations for each country.	1. Four months after the first disbursement.
2.2	Human Resources Policies and Procedures	1. Produce a Human Resources Policy that includes, among other things, information on employee benefits, the Employee Assistance Program, the workday, and the flexible hours policy.	1. Human Resources Policy.	1. Four months after the first disbursement.
2.3	Occupational Health and Safety	1. Produce a document that contains ergonomics recommendations from an occupational health and safety perspective as part of the remote work model.	1. Document containing ergonomics recommendations from an occupational health and safety perspective.	1. Two months after the first disbursement.
		2. Disseminate the Occupational Health and Safety Recommendations document to employees and contractors.	2. Evidence of dissemination.	2. Three months after the first disbursement.
2.4	Grievance Mechanism	1. Develop an Employee Grievance and Complaint Management Mechanism that establishes grievance channels, personnel responsible, response times, and grievance registration procedures, including the option of submitting grievances anonymously and the commitment to non-retaliation.	1. Procedure for the Employee Grievance and Complaint Mechanism.	1. Four months after the first disbursement.
		2. Disseminate the Mechanism to employees and contractors.	2. Evidence of dissemination.	2. Five months after the first disbursement and then as part of the ESCR.
		3. Implement the Mechanism.	3. Evidence of implementation.	3. As part of the ESCR.
<b>PS 3: Resource Efficiency and Pollution Prevention</b>				
3.1	Resource Efficiency and Pollution Prevention	1. Develop a Waste Management Plan.	1. Waste Management Plan.	1. Three months after the first disbursement.
		2. Implement the Waste Management Plan.	2. Evidence of implementation.	2. As part of the ESCR.