

Environmental And Social Plan Action Plan (ESAP)					
Project Name:	ANC	Project ID:	13926-01	Category:	B
Sector:	INDUSTRY	Country:	Costa Rica		

No.	Product/Deliverable	Completion Date
PS1: Assessment and Management of Environmental and Social Risks and Impacts		
1.1 Policy		
1.1.1	Update the Integrated Quality and Environmental Policy to specify who will be responsible for its implementation, and include commitments related to work, social and occupational health and safety issues.	
a.	Updated Integrated Quality and Environmental Policy	60 days after first disbursement
1.1.2	Disseminate the updated Integrated Quality and Environmental Policy.	
a.	Evidence of dissemination	90 days after the first disbursement, and later periodically as part of the Environmental and Social Compliance Report (ESCR)
1.2 Identification of risks and impacts		
1.2.1	Update the risk matrices to assess the potential negative impact the Company's activities may have on the communities.	
a.	Updated risk matrices	120 days after first disbursement
1.3 External communication and grievance mechanisms		
1.1.1	Develop a formal procedure that: i) includes key performance indicators; ii) establishes principles, channels, forms, response times, monitoring and evaluation procedures to deal with external grievances; and iii) describes the way the mechanism will be communicated to the external stakeholders.	
a.	External grievance mechanism	90 days after first disbursement
1.1.2	Disseminate the external grievance mechanism to the stakeholders.	
a.	Evidence of dissemination	120 days after the first disbursement, and later periodically as part of the ESCR
PS2: Labor and Working Conditions		
2.1 Human resources policies and procedures		
2.1.1	Produce a human resources policy that outlines the principles for ANC's labor management.	
a.	Human Resources Policy	60 days after first disbursement
2.1.2	Communicate the human resources policy across the organization.	
a.	Evidence of communication	90 days after the first disbursement and later as part of the ESCR
2.2 Non-discrimination and equal opportunity		
2.2.1	Update the sexual harassment at the workplace procedure to enable anonymous reporting.	
a.	Updated sexual harassment at the workplace procedure	60 days after first disbursement
2.2.2	Communicate the updated sexual harassment at the workplace procedure across the organization	
a.	Evidence of communication	90 days after the first disbursement and later as part of the ESCR
2.3 Grievance mechanism		
2.2.1	Develop a procedure that: i) describes how the internal grievance mechanism works; ii) opens channels to receive questions, grievances, complaints and suggestions anonymously; and iii) describes the way the mechanism will be communicated across the organization.	
a.	Internal grievance mechanism	90 days after first disbursement
2.2.2	Disseminate the internal grievance mechanism across the organization.	
a.	Evidence of communication	120 days after the first disbursement and later as part of the ESCR

2.3 Occupational health and safety		
2.2.1	Update the occupational health and safety program in Costa Rica and Guatemala to manage the contractors' accident risk.	
a.	Updated occupational health and safety program	90 days after first disbursement
2.2.2	Implement the updated occupational health and safety program.	
a.	Evidence of implementation	Periodically as part of the ESCR
PS3: Resource Efficiency and Pollution Prevention		
3.1 Greenhouse gases		
3.1.1	Produce a detailed inventory of Scope 1 and 2 greenhouse gases (GHG) for all ANC operations in Costa Rica and Guatemala to capture the emissions associated with the rented vehicles.	
a.	GHG inventory	120 days after the first disbursement and later as part of the ESCR
3.1 Hazardous materials management		
3.1.1	Develop a corporate procedure to manage hazardous materials, including measures for storage and safe management.	
a.	Hazardous materials management procedure	120 days after first disbursement
3.1.2	Implement the hazardous materials management procedure.	
a.	Evidence of implementation	150 days after the first disbursement and later as part of the ESCR
PS4: Community Health and Safety		
4.1 Community health, safety and security		
4.1.1	Develop a corporate formal procedure to manage traffic accident risks.	
a.	Road safety management procedure	90 days after first disbursement
4.1.2	Implement the road safety management procedure	
a.	Evidence of implementation	120 days after the first disbursement and later as part of the ESCR
4.2 Security personnel		
4.2.1	Update the general instructions for security officers to document the Company's approach to the use of force and firearms as per the Voluntary Principles of Security and Human Rights.	
a.	Updated general instructions for security officers	120 days after first disbursement
4.2.2	Adopt the general instructions for security officers.	
a.	Evidence that the instructions have been adopted by the company providing the physical security service	150 days after first disbursement
4.2.3	Deliver a copy of the risk assessment that justifies the use of fire arms.	
a.	Physical security risk assessment	30 days after first disbursement
PS8: Cultural heritage		
8.1 Chance finds		
8.1.1	Develop a chance finds procedure.	
a.	Chance finds procedure	90 days after first disbursement