

**FYCO TELECOM AMAZON FINANCING  
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")	1. Update the legal requirements matrix to include the status of all permits, licenses, and approvals applicable to the Project and derived from local labor, environmental, and occupational health and safety ("OHS") requirements.	1. Updated legal requirements matrix.	1. As part of the Environmental and Social Compliance Report (ESCR).
		2. Update the Integrated Management System ("IMS") Policy to incorporate the commitment to community health and safety.	2. Updated IMS Policy.	2. Six months after the first disbursement.
		3. Update the procedure for identifying and evaluating environmental risks and impacts, incorporating the analysis of risks and impacts derived from climate change, as well as those generated by the Project's activities on the community.	3. Updated procedure for identifying and evaluating environmental, social, and climate risks and impacts.	3. Six months after the first disbursement.
		4. Update the environmental and social risk and impact identification matrix, incorporating climate-change-derived risks and impacts, as well as those generated by Project activities on the community.	4. Updated environmental, social, and climate risk matrix.	4. Six months after the first disbursement.
		5. Develop plans and procedures for the management of environmental, social, and occupational health and safety ("ESHS") risks.	5. Corporate plans and procedures for the management of ESHS risks.	5. Nine months after the first disbursement.
		6. Implement corporate plans and procedures for ESHS risk management.	6. Evidence of implementation.	6. As part of the ESCR.
		7. Prepare an organizational chart of the ESHS team and support staff in all subsidiaries.	7. ESHS organizational chart.	7. Nine months after the first disbursement.
		8. Update the employee training program to include the management plans to be developed as part of the ESMS.	8. Updated training program.	8. Nine months after the first disbursement.
		9. Develop a Corporate Emergency Preparedness and Response Plan considering the results of the environmental, social, and climate risk and impact identification matrix.	9. Corporate Emergency Preparedness and Response Plan (EPRP).	9. Nine months after the first disbursement.
		10. Implement the Corporate Emergency Preparedness and Response Plan.	10. Evidence of implementation.	10. As part of the ESCR.
		11. Develop a procedure (along with its implementation schedule) for monitoring and auditing the effectiveness of the ESMS.	11. Monitoring and auditing procedure.	11. Nine months after the first disbursement.
		12. Implement the monitoring and auditing procedure.	12. Evidence of implementation.	12. As part of the ESCR.
		13. Develop a stakeholder engagement framework, which will include a stakeholder identification methodology and the outreach processes planning.	13. Stakeholder engagement reference framework.	13. Nine months after the first disbursement.
		14. Implement the stakeholder engagement reference framework.	14. Evidence of implementation.	14. As part of the ESCR.
		15. Prepare a grievance mechanism for external stakeholders, including: i) capture of complaints and grievances; ii) recording, analysis, and referral of response; iii) designation of a team; and iv) follow-up and communication of the response.	15. External grievance mechanism.	15. Nine months after the first disbursement.
		16. Implement the external grievance mechanism.	16. Evidence of implementation.	16. As part of the ESCR.
		17. Develop an ESMS Manual.	17. ESMS Manual.	17. Nine months after the first disbursement.

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		18. Implement the Environmental and Social Management System (ESMS) detailed above.	18. Evidence of implementation.	18. As part of the ESCR.
<b>PS 2: Labor and Working Conditions</b>				
2.1	Internal grievance mechanism	1. Update the internal grievance procedure to (i) allow anonymous complaints to be filed and handled, and (ii) expand its scope to include contractors.	1. Updated internal grievance procedure.	1. Nine months after the first disbursement.
		2. Implement the internal grievance procedure.	2. Evidence of implementation.	2. As part of the ESCR.
2.2	Occupational Health and Safety	1. Develop a Corporate OHS Plan, which will identify the risks associated with its main activities, establish control measures, define an OHS training program for workers (both direct and indirect) and include templates and procedures for documentation and record keeping.	1. Corporate OHS Plan.	1. Nine months after the first disbursement.
		2. Implement the Corporate OHS Plan.	2. Evidence of implementation.	2. As part of the ESCR.
2.3	Workers Engaged by Third Parties	1. Prepare contractual clauses on the prevention of child and forced labor and ESHS requirements for contractors.	1. Copy of the contractual clauses for third parties (contractors).	1. Nine months after the first disbursement.
		2. Include the contractual clauses, as per the previous point, in contractors' contracts.	2. Copies of the relevant sections of the contracts executed with contractors.	2. As part of the ESCR.
2.4	Supply Chain	1. Develop a procedure to identify and assess supply chain risks, mainly linked to child and forced labor.	1. Procedure to identify and assess supply chain risks.	1. Nine months after the first disbursement.
		2. Implement the procedure to identify and assess supply chain risks.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Develop a Supplier Code of Conduct that, at a minimum, requires compliance with applicable labor, health and safety, and environmental laws of each country where production or manufacturing is carried out, as well as International Labor Organization ("ILO") and United Nations international conventions related to working conditions and rights.	3. Supplier Code of Conduct.	3. Nine months after the first disbursement.
		4. Implement the Code of Conduct.	4. Evidence of implementation.	4. As part of the ESCR.
<b>PS 3: Resource Efficiency and Pollution Prevention</b>				
3.1	Waste Management	1. Develop a waste management plan (WMP) at the corporate level to establish responsibilities, internal collection points, segregation protocols, ways to record the amount and type of waste generated, monitoring procedures, and feasible options to reduce, reuse, or recycle waste.	1. Corporate Waste Management Plan.	1. Nine months after the first disbursement.
		2. Implement the WMP.	2. Evidence of implementation.	2. As part of the ESCR.