

E&S Action Plan (ESAP)

Project Name:	Colombia Móvil (Millicom) CapEx (Guarantee)	Project ID:	12799-01	Category:	B
Sector:	Science and Technology	Country:	Colombia		

No.	Action	Product/Deliverable	Completion Date
PS 1: Assessment and Management of E&S Risks and Impacts			
1.1	Reference: Management Programs		
1.1.1	Update template construction contracts to make sure contractors meet current environmental regulations and the management plans established under the Contractor's E&S Plan.	Updated template construction contract	Condition precedent for the issuance of the SBLC
1.1.2	Update the ESMS so that management programs are consistent with national regulations, the Performance Standards, the General Environmental, Health and Safety (EHS) Standards of the World Bank and EHS Guidelines for telecommunications.	Updated management system	90 days after the issuance of the SBLC
1.2	Reference: External Communication and Grievance Mechanisms		
1.2.1	Develop a procedure for the external grievance mechanism whereby the affected communities may contact the Company (anonymously or openly) to make inquiries, express their concerns or submit formal claims.	External grievance mechanism procedure	60 days after the issuance of the SBLC
1.2.2	Update the Contractor's E&S Plan template to incorporate clauses requiring its contractors to implement the external grievance mechanism.	Updated the Contractor's E&S Plan	Condition precedent for the issuance of the SBLC
PS 2. Labor and Working Conditions			
2.1	Reference: Working Conditions and Terms of Employment		
2.1.1	Report the status of open labor proceedings.	Detail of open labor proceedings	Biannually together with the June and December financial statements
2.2	Reference: Grievance mechanism		
2.2.1	Amend the Code of Ethics to include a provision indicating that the use of the grievance mechanism does not substitute the claimants' right to use any other court or administrative proceedings available under local legislation.	Updated Code of Ethics	60 days after the issuance of the SBLC
2.2.2	Update the Internal Work Rules to include the grievance mechanisms available to workers under the Code of Ethics.	Updated Internal Work Rules	60 days after the issuance of the SBLC
2.3	Reference: Occupational Health and Safety (OHS)		
2.3.1	Develop an OHS gap analysis of the contractors that reported serious accidents.	Results of the OHS gap analysis and action plan	90 days after the issuance of the SBLC
2.3.2	Verify the implementation of the corrective measures adopted by the contractors to eliminate the factors identified as root causes of accidents in the OHS gap analysis.	Report on the corrective actions implemented by the contractors	120 days after the issuance of the SBLC

2.3.3	Update the OHS Management System Manual to adopt KPI to monitor the gradual reduction of the number of accidents.	Updated OHS Management System Manual	90 days after the issuance of the SBLC
2.3.4	Develop a formal procedure to monitor contractor compliance with OHS aspects.	Management System Procedure	90 days after the issuance of the SBLC
2.3.5	Implement the Management System procedure to monitor contractor issues mentioned in point 2.3.4.	Evidence of the implementation of the Management System procedure	Annual Reports to IDB Invest
PS 4: Community Health and Safety			
4.1	Reference: Security Personnel		
4.1.1	Update its contracts with security service providers using the IFC's Good Practice Handbook: Use of Security Forces: Assessing and Managing Risks and Impacts to reflect the PS 4 requirements.	Updated security services suppliers' contracts	90 days after the issuance of the SBLC
4.1.2	Ensure that the security personnel receive the necessary ongoing training on security guidelines.	Evidence of security personnel training	Annual Reports to IDB Invest