

**Sheriff Group (Mall) – Guyana
(One Guyana) High Rise
Environmental and Social Action Plan (ESAP)**

No.	Aspect	Action	Deliverable	Delivery date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Compliance with National Regulations (Environmental Permits)	1. Submit environmental and construction permits	1. Environmental and construction permits	1. Prior to start of civil works
		2. Present to the EPA all environmental requirements contained in the corresponding permits.	2. Proof of report submission to the EPA	2. As part of the Environmental and Social Compliance Report (ESCR)
		3. Submit any relevant technical reports	3. Technical reports	3. Prior to start of civil works
1.2	Environmental and Social Management System (ESMS)	1. Prepare an ESMS that includes: i) an E&S policy; ii) an impact matrix identifying potential E&S (including pollution prevention, cumulative impacts and chance finds procedures), occupational health and safety (OHS) risks and impacts, as well as associated control measures; iii) management procedures to prevent, mitigate or compensate any undesired E&S impact and OHS risk (as identified in the matrix), and fulfill requirements contained in environmental permits; iv) an organigram of E&S staff and training schedules on E&S management; v) a comprehensive emergency preparedness and response plan; vi) an updated Stakeholder Engagement Strategy (SES), including stakeholder mapping, consideration for vulnerable groups, a disclosure process, and ongoing consultation and reporting; vii) internal and external grievance handling procedures; viii) environmental audit procedures; and ix) a schedule to monitor effectiveness of the ESMS	1. ESMS Manual	1. 6 months after 1 st disbursement
		2. Implement the ESMS	2. ESMS implementation reports	2. As part of the ESCR
		3. Train staff on ESMS	3. Training reports	3. As part of the ESCR
1.3	Organizational Capacity and Competency	1. Hire or appoint an E&S officer for the Project	1. Evidence of appointment	1. Prior to 1 st disbursement
		2. Prepare job description for the Facilities Manager to include E&S experience	2. Facilities Manager job description	2. Prior to start of operations
1.4	Stakeholder Engagement	1. Designate Community Relations Officer	1. Evidence of designation	1. Prior to 1 st disbursement
		2. Submit a consultation report demonstrating engagement with the nearby community	2. Consultation report	2. Prior to 1 st disbursement or start of civil works (<i>whichever precedes</i>)
		3. Implement external grievance mechanism	3. Grievance reports	3. As part of the ESCR
1.5	Environmental and Social Management Plan (ESMP)	1. Submit Construction-ESMP (C-ESMP) along with E&S organization chart and measures addressing (including but not limited to): i) all identified waste streams and effluents; ii) drainage; iii) H&S guidelines (including communicable diseases); iv) air and dust, noise and vibration impacts; v) landscaping; vi) traffic; vii) cumulative impacts; viii) grievance and chance finds procedures; and x) contractor management guidelines reflecting Company's general HR, Code of Ethics, and H&S and environmental procedures and policies	1. C-ESMP	1. Prior to start of civil works
		2. Implement the C-ESMP	2. Evidence of implementation	2. As part of the ESCR
PS 2: Labor and Working Conditions				
2.1	Human Resource Policies and Procedures	1. Revise Grievance Procedure to include: i) the teams responsible for grievance reception, assessment, and response; ii) descriptions of different grievance categories and assessment procedures linked to wider operations; iii) a description of the specific channels for grievance reception; iv) timing of	1. Revised Grievance Procedure	1. 3 months after 1 st disbursement

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		responses beyond formal reports; and v) options for anonymity, anti-reprisals policy nor dissemination mechanisms		
		2. Present periodic accounts of internal grievances	2. Report on internal grievances	2. As part of the ESCR
		3. Submit HR Policy Manual which includes details on: i) code of conduct; ii) recruitment and selection; iii) compensation and benefits including medical; iv) termination and resignation; v) working hours, leave categories (including maternity or paternity) and holidays; vi) promotion; vii) all the existing policies and procedures including grievance resolution, sexual harassment and GBV, and OHS and environment; viii) performance management; ix) training and development; x) declaration on freedom of association; and xi) use of company property	3. HR Policy Manual	3. 3 months after 1 st disbursement
		4. Disseminate HR Policy Manual to employee, third-party contractors and sub-contractors	4. Proof of dissemination	4. 6 months after 1 st disbursement
		5. Carry out training on key areas of HR policy manual linked to Code of Conduct, sexual harassment and GBV, grievance procedures, and OHS and environment	5. Training reports	5. As part of the ESCR
2.2	Child and Forced Labor	1. Include provisions against the use of child and forced labor in HR Policy Manual and other relevant policies (including those for contractors)	1. Provisions against use of child and forced labor	1. 3 months after 1 st disbursement
2.3	Occupational Health and Safety	1. Prepare H&S Policy Manual to include: i) hazards identification for all operations; ii) risk assessment and classification; iii) measures to manage identified risks; iv) regular monitoring of H&S indicators; v) employees safety training plan; vi) procedures for reporting accidents including root cause analysis; and vii) detailed accident investigation procedures (including applicable emergency contact information)	1. H&S Policy Manual	1. 3 months after 1 st disbursement
		2. Disseminate H&S Policy Manual to employees and third-party contractors	2. Evidence of dissemination	2. 6 months after 1 st disbursement
		3. Submit annual H&S statistics with root cause analysis for any reported accidents.	3. Annual H&S statistics	3. As part of the ESCR
2.4	Provisions for people with disabilities	1. Ensure that the Project Final designs include additional features for Universal Access	1. Representation supporting Universal Access	1. Prior to 1 st disbursement
2.5	Workers Engaged by Third Parties	1. Update Vendor Management Procedure to cover existing or planned operations incorporating relevant HR, H&S, environmental policies and procedures, and Code of Ethics	1. Updated Vendor Management Procedure	1. 3 months after 1 st disbursement
		2. Communicate update to relevant third-party contractors and sub-contractors during the procurement of new services	2. Evidence of communication	2. As part of the ESCR
		3. Prepare contractual clauses for the Project to ensure contractors are bound to general HR, H&S and environmental procedures and policies, and Code of Ethics of the Company	3. Finalized contractual clauses	3. Prior to start of civil works
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Resource Efficiency	1. Include in the Project's design i) sustainability and energy efficiency features according to EDGE certification standards and requirements; and ii) water saving mechanisms (low consumption and flow urinals and toilets, lavatories specified with push or movement sensor etc.)	1. Report on the final Project design	1. Prior to 1 st disbursement
		2. Submit annual implementation report on energy and water efficiency and EDGE compliance	2. Annual implementation reports	2. As part of ESCR
3.1	Waste Management (including hazardous waste)	1. Submit Waste Management Plan ("WMP") that covers the Project's construction and operation phases and captures all waste streams including	1. WMP	1. Prior to 1 st disbursement or start of civil works (<i>whichever precedes</i>)

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		but not limited to solid, liquid, and hazardous waste (including solar panels and battery storage)		
		2. Implement WMP	2. Evidence of implementation	2. As part of the ESCR
3.2	Pesticide Use and Management	1. Outline in the ESMS guidelines to: i) maintain a pesticide inventory and a checklist of certified contractors; and ii) not purchase, store, use, or trade in products that fall in WHO Recommended Classification of Pesticides.	1. Guidelines for pesticide use and management	1. 6 months after 1 st disbursement
PS 4: Community Health, Safety, and Security				
4.1	Community Health and Safety	1. Include in Project design HVAC system with filters to prevent flow of bacteria in the air	1. HVAC specifications	1. Prior to 1 st disbursement
4.2	Infrastructure and Equipment Design and Safety	1. Include in final Project design i) adequate Fire Safety Systems (FSS) that include but is not limited to hoses, smoke detectors, fire exits, alarm pull stations and extinguishers; and ii) drainage and ventilation features to manage flood risk and alleviate excess heat respectively	1. Report on the final Project design with FSS	1. Prior to 1 st disbursement
		2. Implement the FSS for Project	2. Evidence of FSS implementation	2. Upon completion of construction, and thereafter as part of the ESCR
		3. Perform regular tests of the FSS for all facilities to ensure constant operational readiness, including: i) timely recharge of fire extinguishers; ii) periodic fire hose integrity tests; and iii) periodic test of water pump pressure and reach of water jets.	3. Report on fire systems tests	3. As part of the ESCR
		4. Conduct safety training and drills	4. Training and drill reports	4. As part of the ESCR
4.3	Security Personnel	1. Submit a security risk assessment for the Project to identify internal and external security risks, and how these will be managed including details on human rights training in alignment with the Voluntary Principles on Security Forces and Human Rights	1. Security Risk Assessment	1. 1 month after 1 st disbursement