

VTAL NEUTRAL NETWORK INFRASTRUCTURE OPERATOR PROJECT – 14444-01
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 Laws and Regulations	1. Submit environmental licenses for existing and new assets whenever required.	1. Environmental licenses	1. Before initial disbursement.
		2. Submit evidence of compliance with specific environmental license conditions for the assets	2. Technical reports demonstrating compliance with specific license conditions.	2. As part of the Environmental and Social Compliance Report (ESCR).
1.2	Environmental and Social Management System (ESMS).	1. Submit an Environmental Policy.	1. Environmental Policy.	1. Six months after initial disbursement.
		2. Submit a Social Policy	2. Social Policy	2. One year after initial disbursement.
		3. Submit an Environmental Risk and Impact Identification Matrix.	3. Environmental Impact Matrix.	3. Six months after initial disbursement.
		4. Submit a Social Risk and Impact Identification Matrix	4. Social Impact Matrix	4. One year after initial disbursement.
		5. Develop a procedure to assess and optimize alternative locations for portions of the network that cross socially or environmentally sensitive areas, in order to reduce impacts in these areas.	5. Alternative location assessment procedure.	5. One year after initial disbursement.
		6. Develop and submit social management procedures	6. Social management procedures	6. One year after initial disbursement.
		7. Develop and submit environmental management procedures	7. Environmental management procedures	7. One year after initial disbursement.
		8. Develop a Climate Change Exposure Risk Assessment and Control Plan.	8. Climate Change Exposure Risk Assessment and Control Plan.	8. One year after initial disbursement.
		9. Submit reports on the implementation of the Climate Change Exposure Risk Assessment and Control Plan.	9. Annual reports on the implementation of the Climate Change Exposure Risk Assessment and Control Plan	9. As part of the ESMS, beginning 1 year and 6 months after initial disbursement.
		10. When construction is required in indigenous, quilombola or vulnerable communities, develop Environmental and Social Impact Studies and corresponding specific Environmental and Social Impact Management Plans for the construction.	10. Environmental and Social Impact Assessment (ESIA) Studies.	10. Before construction begins, if applicable
		11. If necessary, submit evidence of compliance with the ESMP for construction that crosses indigenous, quilombola or vulnerable communities.	11. ESMP implementation reports.	11. Three months after construction begins, if applicable
		12. When construction is required in conservation units or sensitive habitats, submit specific Environmental and Social Impact Studies (and their corresponding Environmental and Social Impact Management Plans) for the construction.	12. Environmental and Social Impact Assessment (ESIA) Study.	12. Before construction begins, if applicable.

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		13. If necessary, submit evidence of compliance with the ESMP for construction that crosses conservation units or sensitive habitats.	13. ESMP implementation reports.	13. Three months after construction begins, if applicable.
		14. Prepare and submit integrated internal audit reports on ESMS performance.	14. Integrated internal audit reports on the ESMS.	14. Two years after first disbursement and thereafter as part of the ESCR.
1.3	Organizational Capacity	1. Whenever necessary, submit updated organizational charts for the ESG and health and safety areas.	1. Submission of updated organizational charts.	1. As part of the ESCR.
1.4	Stakeholder Engagement	1. Develop specific stakeholder engagement procedures for informal urban communities, to include: i) stakeholder mapping; ii) communication and engagement procedures; iii) grievance mechanism; and iv) procedures for reviewing and responding to community inquiries.	1. Stakeholder Engagement Procedure for Informal Urban Communities.	1. One year after first disbursement.
		2. Whenever necessary, develop a procedure for a free, prior, and informed consultation to apply to construction in indigenous, quilombola or vulnerable communities.	2. Procedure for free, prior, and informed consultation.	2. One year after first disbursement.
		3. Implement an ombudsman system to receive complaints and requests from the outside public, to include: i) identification of channels to receive complaints; ii) confidentiality procedures; iii) complaint review, handling, and response procedures; and iv) internal and external reporting procedures for complaints.	3. Report describing the ombudsman system.	3. Six months after first disbursement.
		4. Submit periodic reports on the stakeholder engagement process, including specific procedures for informal urban communities, free, prior, and informed consultation, and ombudsman channel.	4. Stakeholder Engagement Reports.	4. One year after first disbursement and thereafter as part of the ESCR.
1.5	Emergency Preparedness and Response	1. Develop a Corporate Emergency Preparedness and Response Plan	1. Corporate Emergency Preparedness and Response Plan.	1. Six months after first disbursement.
		2. Submit a summary of emergency events recorded during the Project, including an assessment of response procedures, emergency drills, and action plans to improve the emergency preparedness and response system.	2. Report on Emergencies.	2. As part of the ESCR, beginning 1 year and 6 months after first disbursement
PS 2: Labor and Working Conditions				
2.1	Nondiscrimination and Equal Opportunities	1. Report the implementation results of the Corporate Diversity and Inclusion Strategy.	1. Reports on the implementation of the Corporate Diversity and Inclusion Strategy.	1. As part of the ESCR.
2.2	Human Resource Policies and Procedures	1. Develop a Corporate Human Resources Policy with guidelines for: i) recruitment and personnel selection; ii) onboarding and offboarding; iii) diversity and inclusion; iv) job descriptions and salary ranges; v) employee benefits; vi) termination, vii) contractual rules and standards; viii) union membership, viii) compliance; ix) hiring of persons with disabilities; and x) hiring of underage apprentices.	1. Corporate Human Resources Policy	1. Six months after first disbursement.
2.3	Grievance Mechanism	2. Submit results from the Confidential Channel, including: i) number and types of complaints received from employees, ii) classification of complaints received according to type; iii) handling and response procedures; iv) report on disciplinary measures applied; and v) action plans adopted to improve conditions and work relations, if any.	2. Report on the Confidential Channel.	2. As part of the ESCR.

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2.4	Health, Safety, and Security	1. Submit statistics on work accidents and incidents involving internal and outsourced personnel.	1. Report on work accidents and incidents.	1. As part of the ESCR.
		2. Submit a health, safety, and security training schedule.	2. Health, safety, and security training schedule.	2. As part of the ESCR.
		3. Submit periodic audit reports for providers of design, installation, and maintenance services for telecommunications networks, indicating Provider Compliance Indexes.	3. Audit Reports for Providers and Provider Compliance Indexes.	3. As part of the ESCR, beginning 1 year and 6 months after first disbursement
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Resource Efficiency	1. Submit an Energy Efficiency Policy.	1. Energy Efficiency Policy.	1. Before first disbursement.
		1. Develop and implement a Water Use Monitoring and Optimization Plan containing: i) integrated water use monitoring at assets; ii) water consumption reduction goals; and iii) plan of action to reduce water consumption.	1. Water Use Monitoring and Optimization Plan.	1. Six months after first disbursement.
		2. Submit evidence of implementation of the Water Use Monitoring and Optimization Plan.	2. Monitoring Reports for the Water Use Monitoring and Optimization Plan	2. One year after first disbursement and thereafter as part of the ESCR.
3.2	Greenhouse Gases	1. Submit annual report on Greenhouse Gas (GHG) monitoring results.	1. GHG Monitoring Report.	1. As part of the ESCR.
3.3	Pollution Prevention	1. Develop a Fiber Optic Waste Recycling and Reverse Logistics Plan	1. Fiber Optic Waste Recycling and Reverse Logistics Plan	1. Six months after first disbursement.
		2. Submit implementation results of the Fiber Optic Waste Recycling and Reverse Logistics Plan	2. Report on the Fiber Optic Waste Recycling and Reverse Logistics Plan.	2. One year after first disbursement and thereafter as part of the ESCR.
		3. Develop a Corporate Solid Waste Management Procedure to include all waste streams associated with Company activities.	3. Corporate Solid Waste Management Procedure	3. Six months after first disbursement.
		4. Submit report on the implementation of the Corporate Solid Waste Management Procedure.	4. Integrated report on the Corporate Solid Waste Management Procedure	4. One year after first disbursement and thereafter as part of the ESCR.
PS 4: Community Health, Safety, and Security				
4.1	Community Health, Safety, and Security	1. Develop an Access Security Management Plan containing traffic routing and safety measures to be applied during network expansion or new facility construction.	1. Access Security Management Plan.	1. One year after first disbursement.
		2. Submit a report containing the implementation results of the Access Security Management Plan.	2. Report on the Access Security Management Plan.	1. Two years after first disbursement.
		3. Develop a Corporate Environmental and Social Management Plan for Construction with corporate guidelines to include: i) stakeholder communication measures; ii) procedures to store materials, including hazardous materials; iii) solid waste and effluent management; iv) health, safety, and security measures for construction; v) air quality impact controls; vi) noise control; vii) heavy equipment usage procedures; and viii) traffic safety measures.	3. Corporate Environmental and Social Management Plan for Construction	2. One year after first disbursement.

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		4. Train employees and outsourced companies on the Corporate Environmental and Social Management Plan for Construction.	4. Personnel training events on the Corporate Environmental and Social Management Plan for Construction	3. One year after first disbursement.
		5. Submit training records for internal personnel and outsourced providers on the Corporate Environmental and Social Management Plan for Construction.	5. Evidence of personnel training.	4. One year after first disbursement and thereafter as part of the ESCR.
		6. Submit annual reports on the implementation of a Corporate Environmental and Social Management Plan for Construction.	6. Reports on the implementation of a Corporate Environmental and Social Management Plan for Construction.	5. One year after first disbursement and thereafter as part of the ESCR.
4.2	Security Personnel	1. Develop a protocol for property security personnel training on human rights and nonviolent communication methods.	1. Protocol for security personnel training on human rights and nonviolent communication methods.	1. One year after first disbursement
		2. Submit evidence of property security personnel training	2. Evidence of security personnel training.	2. One year and six months after first disbursement.
PS 8: Cultural Heritage				
8.1	Procedures for unexpected finds	1. Develop a Procedure for Unexpected Archaeological Finds.	1. Procedure for Unexpected Archaeological Finds.	1. Two years after first disbursement.
		2. Report on implementation results of the Procedure for Unexpected Archaeological Finds.	2. Report on the Procedure for Unexpected Archaeological Finds.	2. Two years after first disbursement and thereafter as part of the ESCR.