

AIR-E - COLOMBIA
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	Identification of Risks and Impacts	1. Incorporate an analysis of climate-related risks into the Company's risk and impact identification and evaluation matrices.	1. Updated risk and impact identification and evaluation matrices	1. Within six months of first disbursement
1.2	Community Grievance Mechanism	1. Develop a flyer making it clear that the PQR mechanism can receive community grievances related to specific projects.	1. Community Grievances Flyer	3.1 Prior to first disbursement
		2. Distribute the flyer to affected communities during projects.	2. Evidence of flyer distribution	3.2 As part of the Environmental and Social Compliance Report (ESCR)
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Noise	1. Update the Environmental Noise Monitoring Program for Substations and High-tension Power Lines to reference the limits in the noise level guidelines from the IFC General EHS Guidelines.	1. Updated Environmental Noise Monitoring Program	1. Prior to first disbursement
		2. Apply the updated program to all new infrastructure developments.	2. Evidence of the application of the noise limits in the IFC General Guidelines to all new infrastructure developments.	2. As part of the ESCR
PS 4: Community Health, Safety, and Security				
4.1	Security Personnel	1. Develop a corporate Security Management Plan.	1. Security Management Plan	3. Prior to first disbursement
		2. Implement the Security Management Plan.	2. Evidence of Security Management Plan implementation	4. As part of the ESCR
PS 5: Land Acquisition and Involuntary Resettlement				
5.1	Land Acquisition	1. Update the Company's Land Acquisition Procedure to include a requirement to evaluate physical and/or economic displacement.	1. Updated Land Acquisition Procedure	1. Prior to first disbursement
		2. Develop a Resettlement Action Plan for each project in which physical or economic displacement is identified.	2. Resettlement Action Plan(s)	2. Prior to the acquisition of land for each applicable project
		3. Implement the Resettlement Action Plan(s).	3. Evidence of Resettlement Action Plan(s) implementation.	3. As part of the ESCR (if applicable)
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
6.1	Protection and Conservation of Biodiversity	1. Systematically review the Company's existing electrical installations for opportunities to implement control measures to minimize avian and bat collisions and electrocutions.	1. Bird and bat collision and electrocution prevention and control measures	1. Within six months of first disbursement
		2. Implement the measures as part of the Company's equipment maintenance and improvement program.	2. Evidence of bird and bat collision and electrocution prevention and control measure implementation	2. As part of the ESCR
6.2	Protection and Conservation of Biodiversity	1. Incorporate into the Company's ESMS a procedure for minimizing vegetation trimming in the rights of way of distribution lines.	1. Habitat impact mitigation measures procedure	1. Within six months of first disbursement
		2. Implement the procedure.	2. Evidence of habitat impact mitigation measures procedure implementation	2. As part of the ESCR
PS 7 Indigenous Peoples				
7.1	Circumstances Requiring Free, Prior, and Informed	1. Develop a Free, Prior, and Informed Consent (FPIC) procedure to: i) ensure that the Company's major projects identify indigenous, Afro-descendant,	1. Free, Prior, and Informed Consent procedure	1. Prior to first disbursement

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	Consent	and other ethnic minority communities within their areas of influence, regardless of whether they are recognized by the Colombian government; ii) evaluate whether these projects trigger the circumstances requiring FPIC, regardless of whether prior consultation is required under Colombian law; and iii) obtain and document FPIC from triggered communities.		
		2. Implement the FPIC procedure for the Company's significant projects (i.e., those that require an EMP or EIA).	2. Evidence of FPIC procedure implementation	2. As part of the ESCR (if applicable)
		3. Obtain and document the FPIC of triggered communities.	3. Documentation of FPIC	3. As part of the ESCR (if applicable)
PS 8: Cultural Heritage				
8.1	Chance Find Procedures	1. Update the Company's Chance Find Procedures to include training in the identification of chance finds for workers engaged in ground-disturbing activities.	1. Updated Chance Find Procedures	1. Prior to first disbursement