

Environmental and Social Action Plan (ESAP)					
Project Name:	Lottus: Expanding Affordable Education in Mexico - MEXICO	Project ID:	15189-01	Category:	B
Sector:	EDUCATION	Country:	Mexico		

No.	Product/Deliverable	Expected completion date
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>		
<b>1.1 Identification of risks and impacts</b>		
1.1.1	Develop a procedure to systematically identify the environmental and social (E&S) risks and impacts.	
a.	Procedure to identify E&S risks and impacts	120 days after the first disbursement
1.1.2	Implement the procedure to identify E&S risks and impacts.	
a.	Updated E&S risk matrices	180 days after the first disbursement and later as part of the Environmental and Social Compliance Report (ESCR)
<b>1.2 Gender Programs</b>		
1.2.1	Develop programs to encourage awareness and rejection of gender-based violence and harassment.	
a.	Gender programs	120 days after the first disbursement
1.2.2	Implement the gender programs across campuses.	
a.	Evidence of implementation	180 days after the first disbursement and later as part of the ESCR
<b>1.3 Organizational Capacity and Competency</b>		
1.3.1	Hire or appoint a person to handle occupational risk management issues at corporate level.	
a.	Copy of the contract or appointment document	90 days after the first disbursement
1.3.2	Organize the health and safety commissions across work centers in compliance with NOM-019-STPS-2011.	
a.	Organization document	120 days after the first disbursement
<b>1.4 Monitoring and Review</b>		
1.4.1	Develop a corporate procedure to monitor and track its E&S performance in its work centers, which will include key performance indicators and internal audit protocols to assess the implementation of the environmental and social management system (ESMS), identify improvement opportunities and define which information will be reported periodically to the top management.	
a.	Monitoring and tracking procedure	90 days after the first disbursement
1.4.2	Implement the monitoring and tracking procedure.	
b.	Evidence of implementation.	As part of the ESCR
1.4.3	Develop, for each work center, an annual schedule of verification tours for the commissions as instructed by NOM-019-STPS-2011.	
a.	Annual schedule of verification tours	120 days after the first disbursement
1.4.4	Implement the annual schedule of verification tours across work centers.	
a.	Documentary proof of the verification tours completed by the different commissions	As part of the ESCR
<b>1.5 External communication and grievance mechanisms</b>		
1.5.1	Update the reporting channel so other stakeholders can communicate and submit questions, grievances, claims and suggestions related with the Company's E&S performance.	
a.	Updated procedure for the reporting channel	90 days after the first disbursement

<b>PS 2: Labor and Working Conditions</b>		
<b>2.1 Human resources policies and procedures</b>		
2.1.1	Develop a human resources policy in line with the international best practices.	
a.	Human Resources Policy	60 days after the first disbursement
2.1.2	Communicate the human resources policy across the organization.	
a.	Evidence of communication.	120 days after the first disbursement and later as part of the ESCR
<b>2.2 Grievance mechanism</b>		
2.2.1	Prepare a procedure that documents the process to manage labor grievances that are different from workplace harassment acts.	
a.	Internal grievance mechanism.	90 days after the first disbursement
2.2.2	Implement the internal grievance mechanism.	
a.	Evidence of communication	60 days after the first disbursement
<b>2.3 Occupational health and safety</b>		
2.3.1	Develop a procedure to investigate labor accidents, identify roots causes and correct the conditions to prevent future occupational accidents of payroll and contractors' staff.	
a.	Procedure to investigate occupational accidents	120 days after the first disbursement
2.3.2	Implement the procedure to investigate occupational accidents.	
a.	Occupational accidents log	As part of the ESCR
<b>PS 3: Resource Efficiency and Pollution Prevention</b>		
<b>3.1 Waste</b>		
3.1.1	Develop a procedure for comprehensive waste management, which includes programs to reduce its generation and encourage materials recycling at the campuses.	
a.	Comprehensive waste management procedure	120 days after the first disbursement
3.1.2	Implement the comprehensive waste management procedure across campuses.	
a.	Evidence of implementation.	As part of the ESCR
<b>PS 4: Community Health, Safety and Security</b>		
<b>4.1 Community health, safety and security</b>		
4.1.1	Prepare a comprehensive fire safety improvement plan that allows for identifying fire risks and proposes handling measures.	
a.	Comprehensive fire safety improvement plan	As part of the ESCR
4.1.2	Implement the comprehensive fire safety improvement plan.	
a.	Report of the implementation of the fire safety improvements	As part of the ESCR
4.1.3	Develop a corporate manual of life and fire safety design that is aligned with the national regulations and the NFPA 101 standard, which includes the accessibility requirements and checklists to select and evaluate facilities to be rented in the future.	
c.	Corporate manual of life and fire safety design	210 days after the first disbursement
4.1.4	Implement a corporate manual of life and fire safety design.	
a.	Evidence of implementation.	As part of the ESCR