

**Eleuthera Road Rehabilitation – BAHAMAS
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	Assessment and Management of Environmental and Social Risk	1. Develop an Environmental Management Plan (“EMP”) specific to the Project, in compliance with the suitable environmental laws.	1. EMP specific to the Project.	1. 60 days before the order to commence construction.
		2. Implement the EMP specific to the Project.	2. Evidence of implementation.	2. As part of the Environmental and Social Compliance Report (“ESCR”).
		3. Secure approval of the Certificate of Environmental Clearance (“CEC”).	3. CEC for the Project.	3. 15 days before the order to commence construction.
1.2	Environmental Management System (EMS)	1. Develop an Environmental and Social Management System (“ESMS”) to ensure the policies and procedures of Caribbean Pavement Solutions Ltd. (“CPS” or the “Company”) are tailored specifically to this Project.	1. ESMS of the Project.	1. 210 days after signing the loan agreement.
		2. Implement the ESMS of the Project	2. Evidence of the ESMS implementation.	2. 210 days after signing the loan agreement, and thereafter as part of the ESCR.
		3. Assess the implementation of the ESMS.	3. ESMS assessment report.	3. 120 days after implementation.
1.3	Policy	1. As part of the EMP, develop an Environmental Policy.	1. Environmental Policy.	1. 60 days after signing the loan agreement.
		2. Adopt the Environmental Policy	2. Evidence of adopting the policy.	2. As part of the ESCR.
1.4	Direct and indirect impacts and risks	1. As part of the EMP, develop a Project-specific environmental and social (“E&S”) and occupational health and safety (“OHS”) risk and impact matrices, associated with each phase of the Project’s activities and those from Subcontractor’s.	1. Project-specific E&S and OHS risk and impact matrices.	1. As part of the EMP.
		2. Implement the Project-specific E&S and OHS risk and impact matrices	2. Evidence of the implementation.	2. As part of the ESCR.
1.5	Climate change exposure	1. Prepare a Project-specific Hurricane Response Plan that will include pre-hurricane and post-hurricane safety precaution measures.	1. Project-specific Hurricane Response Plan.	1. 90 days after signing the loan agreement.
		2. Implement the Project-specific Hurricane Plan	2. Evidence of the implementation.	2. As part of the ESCR.
1.6	Management Programs	1. As part of the EMP, develop detailed Project-specific Management Program with operating controls and measures needed to eliminate, transfer or mitigate each significant risk or impact that has been detected, including: (i) preventive controls, focused on eliminating or reducing the frequency, probability and severity of the negative impacts or risks, supported by preventive and predictive maintenance programs for equipment and machinery, as well as by	1. Detailed Project-specific Management Program.	1. 60 days after signing the loan agreement.

No.	Aspect	Action	Deliverable	Delivery date
		ongoing training programs for employees and drill programs; and (ii) technical and operating recommendations, which are based on the national OHS and environmental regulations.		
		2. Implement the detailed Project-specific Management Program	2. Evidence of the implementation.	2. As part of the ESCR.
1.7	Organizational capacity and competency	1. Designate an Environmental Manager, responsible for the implementation of the Project's EMP and to report to the Owner's Representative, the Department of Environmental Planning and Protection ("DEPP"), and any other agency, the Project's compliance status and E&S performance.	1. Designated Environmental Manager.	1. 60 days after signing the loan agreement.
1.8	Emergency preparedness and response	1. Develop a Project-specific Hurricane Preparedness Plan, which includes for each emergency situation: (i) response procedures; (ii) requirements for the conformation of response brigades; (iii) a list of contacts and communication systems and protocols; (iv) procedures to engage with the local and regional authorities ¹ for health and emergency issues; (v) a list and the locations of the permanent emergency equipment and facilities to attend these natural hazards; (vi) evacuation routes and meeting points; (vii) a description and a calendar for training exercises and drills including external stakeholders (for example, neighboring communities and facilities, among others.); (viii) annual training programs; (ix) root cause analyses protocols for any major accident or fatality; and (x) a description of the corrective actions required to minimize the risk of new occurrences	1. Hurricane Preparedness Plan.	1. 90 days after signing the loan agreement.
		2. Implement the Hurricane Preparedness Plan	2. Evidence of the implementation.	2. As part of the ESCR.
		3. Prepare a Project-specific Environmental Contingency Plan ("ECP"), which contains environmental emergency response and restoration guidelines for any spill or accidental release of a pollutant, hazardous substances that may pose a threat to human health of the environment.	3. Project-specific Environmental Contingency Plan (ECP).	3. 90 days after signing the loan agreement.
		4. Implement Project-specific ECP.	4. Evidence of the implementation.	4. As part of the ESCR.
1.9	Stakeholder engagement	1. Implement the Stakeholder Engagement Plan ("SEP") according to the needs and conditions of the Project.	1. Evidence of the implementation.	1. As part of the ESCR.
1.10	Communities Grievance Mechanism	1. Implement the External Grievance Mechanism ("EGM") according to the needs and conditions of the Project.	1. Evidence of the implementation.	1. As part of the ESCR.
PS 2: Labor and Working Conditions				
2.1	Human resources policies and procedures	1. Develop and adopt an Umbrella Human Resources Policy that sets out its approach to managing its employees and will also disseminate it to all Project workers, suppliers and contractors.	1. Umbrella Human Resources Policy.	1. 120 days after signing the loan agreement.

¹ Department of Meteorology Office; the National Emergency Management Agency ("NEMA"); and the Royal Bahamas Police Force.

No.	Aspect	Action	Deliverable	Delivery date
		2. Adopt the Umbrella Human Resources Policy	2. Evidence of adopting the policy.	2. As part of the ESCR.
2.2	Working conditions and terms of employment	1. Develop an Internal Labor Rulebook (ILR) with the rules and conditions related to: the nature of the work; methods and conditions for personnel recruitment and hiring; onboarding, suspension and dismissal of workers; working days and hours, breaks and holidays; punctuality, leaves and absences; flexible work schemes to promote collaboration and productivity; salary; supplies, tools, materials and equipment (including personal protective equipment – PPE); training; safety, health and environmental measures; professional risks; the Company's obligations and prohibitions; workers' rights and obligations; workers' prohibitions; punctuality, attendance and leave non-compliance; and sanctions.	1. Internal Labor Rulebook.	1. 120 days after signing the loan agreement.
		2. Implement the ILR	2. Evidence of the implementation.	2. As part of the ESCR.
2.3	Grievance mechanism	1. Develop an Internal Grievance Mechanism (IGM) or Whistleblower System, that integrates various forms to capture grievances and claims through communication channels such as the currently used, and through digital means (email, the website, the employee portal or the dedicated phone line	1. Internal Grievance Mechanism.	1. 120 days after signing the loan agreement.
		2. Implement the IGM	2. Evidence of the implementation.	2. As part of the ESCR.
2.4	Occupational health and safety	1. Develop a Project-specific OHS Risk Assessment for all risky work defined in the diagnostic of the Project's activities, containing the guidelines and behaviors to: (i) identify hazards; (ii) evaluate risks; and (iii) establish prevention, correction, control or transfer measures to: (a) protect the physical integrity of employees (prevent injuries and damage to their health).	1. Project-specific OHS Risk Assessment	1. 90 days after signing the loan agreement.
		2. Implement the Project-specific OHS Risk Assessment.	2. Evidence of the implementation.	2. As part of the ESCR.
2.5	Supply chain	1. Prepare a Sustainable Purchase Policy to regulate the acquisition of materials, equipment, and services, that requires the Company's suppliers to the labor regulations of the countries where they operate (specifically, prohibiting child and forced labor, refraining from using any product or service produced with child or forced labor in its business activity), as well as those for OHS.	1. Sustainable Purchase Policy	1. 120 days after signing the loan agreement.
		2. Implement the Sustainable Purchase Policy	2. Evidence of the implementation.	2. As part of the ESCR.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Greenhouse gases (GHG)	1. Prepare an Annual GHG Emissions Inventory for each of its facilities and road improvement activities of the Project, that includes Scope 1 and Scope 2 explaining the variations detected with respect to the base year.	1. Annual GHG Emissions Inventory	1. As part of the ESCR.

No.	Aspect	Action	Deliverable	Delivery date
		2. Develop a methodology to account for Scope 3 GHG emissions associated with the Project.	2. Methodology to account for Scope 3 GHG emissions	2. With the first Annual GHG Emissions Inventory.
		3. Adopt the methodology to incorporate Scope 3 in the Annual GHG Emissions Inventory.	3. Evidence of the adoption	3. As part of the ESCR.
PS 4: Community Health, Safety, and Security				
4.1	Infrastructure and Equipment Design and Safety	1. Engage qualified professionals in life and fire safety (L&FS) systems to certify that: (i) the Project's Asphalt Plant has been constructed in compliance with the approved L&FS designs; (ii) all equipment has been installed in compliance with the L&FS designs; and (iii) all L&FS equipment has been tested in compliance with international requirements.	1. Certification of the Fire Protection System.	1. 90 days after signing the loan agreement.