

**Jamaica Public Service Company I (JPS I) - JAMAICA
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	1. Update permit register by including all requirements from existing and proposed permits and their current implementation status	1. Revised permit spreadsheet	1. March 31, 2024, and thereafter as part of the Environmental and Social Compliance Report (ESCR)
1.2	Environmental and Social Management System (ESMS)	1. Prepare an ESMS that includes an E&S management policy.	1. ESMS	1. December 31, 2024
		2. Adopt the ESMS	2. Evidence of implementation	2. As part of the ESCR
		3. Update the OHSE Policy document to adequately reflect appropriate E&S management processes and procedures	3. Updated OHSE Policy Document	3. September 30, 2024
		4. Prepare a Corporate Social Responsibility Policy	4. Corporate Social Responsibility Policy document	4. June 30, 2024
		5. As part of ESMS, prepare an E&S identification matrix	5. E&S identification matrix.	5. September 30, 2024.
		6. Update the E&S identification matrix	6. Updated E&S identification matrix	6. A part of the ESCR
		7. Outline a process for identifying E&S risks and impacts linked to business activities (including offices and associated facilities)	7. E&S identification process	7. September 30, 2024
		8. Update the Code of Ethics and Business Conduct and the Sexual Harassment Workplace Policy to include i) zero tolerance provisions towards sexual exploitation of minors and GBV; and ii) workforce trainings/awareness campaigns.	8. Updated Code of Ethics and Business Conduct and Sexual Harassment Workplace Policy	8. June 30, 2024
		9. Update the Emergency Preparation and Response (EPR) plan to include a Hurricane Preparedness Plan	7. Updated EPR Plan	9. September 30, 2024
		10. As part of the ESMS, prepare E&S management procedures to i) streamline existing programs while applying the mitigation hierarchy; ii) incorporate the role of relevant actions and events controlled by third parties; and ii) include ESMS auditing.	8. E&S Management Procedures.	10. December 31, 2024
		11. As part of the ESMS provide i) E&S organigram of E&S staff with roles and responsibilities; and ii) and training schedules on E&S management, ERP, and health, and safety.	9. Organigram with responsibilities and training schedule	11. September 30, 2024
		12. As part of the ESMS, prepare a standalone stakeholder engagement plan ("SEP") that includes details on: i) information disclosure; ii) process for informed consultation; iii) procedures for private sector responsibilities; iv) grievance process for all identified stakeholder groups including communities; v) vulnerable groups; and vi) ongoing reporting.	10. Standalone Stakeholder Engagement Plan	12. September 30, 2024
		13. Implement the SEP	11. Evidence of implementations	13. As part of the ESCR
		14. Revise Outreach Policy and Procedures to assess KPIs and measure the impact level of the Company's projects.	12. Revised Outreach Policy and Procedures	14. September 30, 2024, and thereafter as part of ESCR
PS 2: Labor and Working Conditions				
2.1	Human Resource Policies and Procedures	1. Update the HR policy to include i) Occupational Health and Safety (OHS) Act and ILO's Declaration on the Fundamental Principles and Rights at Work; and ii) adoption of paternity leave	1. Updated HR Policy	1. Status as part of 1 st ESCR.
2.2	Workers Organization	1. Prepare the employee communication and engagement strategy	1. Employee communication and engagement strategy document	1. March 31, 2024.

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		2. Implement the employee communication and engagement strategy	2. Evidence of implementation	2. As part of the ESCR
		3. Fill vacancy for HR officer for Industrial Relations	3. Copy of corresponding contract or work assignment.	3. With the 1st ESCR
2.3	Grievance Mechanism	1. Finalize Grievance Procedure Policy to ensure that informal grievances can be addressed with anonymity where there are sensitivities or fear of reprisal.	1. Grievance Procedure Policy	1. June 30, 2024.
		2. Implement the grievance procedure,	2. Evidence of implementation	2. As part of the ESCR
2.4	Prevention of Child and Forced Labour	1. Update HR Policy to and Code of Ethics and Business Conduct to include explicit reference and provisions against child and forced labor	1. Updated HR Policy and Code of Ethics and Business Conduct	1. June 30, 2024.
2.5	Occupational Health and Safety	1. Prepare the Safety and Health Management System (SHMS)	1. Safety and Health Management System (SHMS)	1. June 30, 2024.
2.6	Supply Chain	1. Update the procurement and OHSE policies to: i) monitor supply chain; and ii) establish procedures and measures regarding avoidance of child/ or forced labor along the supply chain.	1. Updated Procurement and OHSE policies	1. June 30, 2024.
		2. Communicate the updated policies to third parties	2. Evidence of communication	2. Status as part of 1st ESCR
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Resource Efficiency	1. Perform a corporate internal energy audit (with recommendations to improve energy efficiency via Energy Efficiency Program) for all facilities	1. Energy audit report	1. Sept. 30, 2024, and thereafter as part of ESCR
		2. Implement Energy Efficiency Program	2. Energy Efficiency Report	2. Status as part of 1st ESCR
3.2	Greenhouse Gas Emissions	1. Prepare a Corporate GHG Monitoring and Management Plan	1. GHG Monitoring and Management Plan	1. December 31, 2024
		2. Implement the Corporate GHG Monitoring and Management Plan	2. Evidence of implementation.	2. As part of the ESCR
		3. Prepare carbon offset reports	3. Carbon offset report	3. December 31, 2024, and thereafter as part of the ESCR
		4. Prepare annual GHG emissions report	4. GHG emissions report	4. June 30, 2024, for 2022 report, and thereafter as part of the ESCR
3.3	Water Consumption	1. Prepare a Water Resources Management Plan to monitor, manage and improve water usage.	1. Water Resources Management Plan	1. December 31, 2024
		2. Implement the Water Resources Management Plan	2. Evidence of implementation	2. As part of the ESCR
3.4	Waste Management (including hazardous waste)	1. Prepare site-specific waste management plans according to local requirements	1. Site-specific waste management plans	1. December. 31, 2024.
		2. Implement the site-specific waste management plans	2. Evidence of implementation	2. As part of the ESCR
		3. Update Waste Management Policy and Plan (including a Spill Prevention, Control and Response Plan, proper disposal for vegetation, and cross-reference to supplementary waste management plans)	3. Updated Waste Management Policy and Plan	3. December. 31, 2024.
		4. Implement the Waste Management Plan	4. Evidence of implementation	4. As part of the ESCR
		5. Update Asbestos and Asbestos Containing Material Management Program	5. Updated Asbestos and Asbestos Containing Material Management Program	5. December. 31, 2024.
		6. Implement the Asbestos and Asbestos Containing Material Management Program	6. Evidence of implementation	6. As part of the ESCR
		7. Develop management system to streamline management plan for all applicable facilities	7. Management system for organizational waste management plans	7. December. 31, 2024.
		8. Implement the management system	8. Evidence of implementation	8. As part of the ESCR

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3.5	Pesticide Use and Management	1. Update Rodent and General Pest Control Services Program to include pesticide use and management.	1. Updated Rodent and General Pest Control services Program	1. December. 31, 2024.
PS 4: Community Health, Safety, and Security				
4.1	Community Health and Safety	1. Prepare complaints log regarding air pollution for permitted facilities	1. Complaints log	1. June 30, 2024, and thereafter as part of the ESCR.
4.2	Infrastructure and Equipment Design and Safety	1. Assess the integrity of all operational infrastructure (including all office buildings) to cope with primary identified hazards (including coastal storm surge, floods and earthquakes).	1. Assessment on operational infrastructure	1. June 30, 2025
		2. Perform drills in all offices	2. Drill reports	2. December 31, 2024
		3. Implement drill report recommendations	3. Status report	3. Status as part of 1st ESCR
4.3	Emergency Preparedness and Response	1. Prepare a Business Continuity Plan	1. Business Continuity Plan	1. March 31, 2024.
		2. Prepare a <i>Comprehensive Disaster Management Program</i>	2. Comprehensive Disaster Management Program document	2. March 31, 2024.
4.4	Security Personnel	1. Prepare a Security Risk assessment	1. Security risk assessment	1. March 31, 2024.
		2. Develop a grievance mechanism procedure for any affected stakeholder to express concerns about the security arrangements and acts of security personnel and evidence of incorporation within relevant policies.	1. Grievance mechanism procedure for security personnel	2. September 30, 2024
		3. Implement the grievance mechanism procedure for security personnel	2. Evidence of implementation.	3. As part of the ESCR