

CENTRO MEDICO JEROVIA MOUNT SINAI PROJECT
Environmental and Social Action Plan – ESAP

No.	Aspect	Action	Deliverable	Delivery date
PS1: Assessment and Management of E&S Risks and Impacts				
1.1	Compliance with Paraguayan legislation requirements	1. Submit all the licenses and permits required for the construction and operation of the Project, providing evidence of compliance with national, provincial, and municipal legislation applicable.	1. Licenses and permits,	1. Prior to first disbursement.
1.2	Environmental and Social Management System (ESMS).	1. Implement an environmental and social management system (ESMS) for the Project.	1. Evidence of the ESMS implementation.	1. Prior to first disbursement.
		2. Update the ESIAp after the conclusion of the executive engineering project.	2. Updated Environmental and Social Impact Assessment (ESIA).	2. Prior to first disbursement
		3. Update the risk and impact management programs based on the updated ESIAp, including new programs and actions to manage E&S impacts in the ESMS.	3. Updated ESMS.	3. Prior to first disbursement
		4. Assess the effectiveness of the ESMS through audits.	4. ESMS audit reports.	4. As part of the Environmental and Social Compliance Report (ESCR).
1.3	Organizational capacity and competency	1. Prepare an Organizational Capacity and Competency Plan identifying the human resources necessary to implement and manage the ESMS adequately during the Project construction phase.	1. Organizational Capacity and Competency Plan for the Project's construction phase	1. Prior to first disbursement.
		2. Prepare an Organizational Capacity and Competency Plan identifying the human resources necessary to implement and manage the ESMS adequately during the Project operation phase.	2. Organizational Capacity and Competency Plan for the Project's operation phase	2. 90 days before the completion of the Project's construction phase.
		3. Hire or appoint the necessary professionals as indicated by the Organizational Capacity Plan for the construction phase.	3. Copy of the contracts or personnel appointments.	3. Prior to first disbursement.
		4. Hire or appoint the necessary professionals as indicated by the Organizational Capacity Plan for the operation phase.	4. Copy of the contracts or personnel appointments.	4. 60 days before the completion of the Project's construction phase.
1.4	Stakeholder engagement	1. Submit a Stakeholders Engagement Plan for the Project's construction phase..	1. Construction phase Stakeholders Engagement Plan.	1. Prior to first disbursement
		2. Submit a Stakeholders Engagement Plan for the Project's operation phase.	2. Operation phase Stakeholders Engagement Plan.	2. 60 days before the completion of the Project's construction phase.
		3. Implement the Stakeholders Engagement Plan.	3. Stakeholders' engagement reports.	3. As part of the ESCR.
		4. Prepare a community grievance mechanism allowing for the reception of anonymous complaints and describing the ways to receive, direct, address and respond to the grievances.	4. External grievance mechanism.	4. Prior to first disbursement.
		5. Report any external grievances received, identifying the types and the responses provided.	5. External grievance treatment statistics.	5. As part of the ESCR.

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		6. Prepare a Community and Environmental Intervention and Strategy Plan considering the Project integration with neighboring communities.	6. Community and Environmental Intervention and Strategy Plan.	6. Prior to first disbursement.
		7. Report the progress on the implementation of the Community and Environmental Intervention and Strategy Plan.	7. Progress reports on the Community and Environmental Intervention and Strategy Plan.	7. As part of the ESCR.
1.5	Emergency preparedness and response	1. Draft an Emergency Preparedness and Response Plan for the construction phase.	1. Construction phase Emergency Preparedness and Response Plan.	1. Prior to first disbursement.
		2. Draft an Emergency Preparedness and Response Plan for the operation phase.	2. Operation phase Emergency Preparedness and Response Plan.	2. Three months prior to the beginning of the operations.
		3. Submit a report on the emergency preparedness and response personnel training, including details on the drills carried out.	3. Emergency preparedness and response reports.	3. As part of the ESCR.
		4. Submit reports on emergency situations.	4. Emergency situation reports	4. As part of the ESCR.
PS2: Labor and working conditions				
2.1	Human resources policies and procedures	1. Submit a Human Resources Policy ensuring compliance with Paraguayan labor laws, as well as collective bargaining agreements and the requirements aligned with the best international practices.	1. Human Resources Policy.	1. Prior to first disbursement.
2.2	Non-discrimination and equal opportunity	1. Submit a Code of Ethics and Integrity with provisions on compliance with human rights, equal opportunity, diversity and inclusion, non-discrimination, and non-acceptance of slave of child labor.	1. Code of Ethics and Integrity.	1. Prior to first disbursement.
		2. Submit a Local Personnel Training and Recruitment Plan establishing local personnel hiring goals, training actions for the job positions to be offered by the Project and job posting for residents of the nearby areas.	2. Local Personnel Training and Recruitment Plan.	2. Prior to first disbursement.
		3. Assess the implementation of the Local Personnel Training and Recruitment Plan, especially in connection with the goals set for the hiring and permanence of local personnel, for the construction phase.	3. Progress reports of the Local Personnel Training and Recruitment Plan for the construction phase.	3. As part of the ESCR.
		4. Assess the implementation of the Local Personnel Training and Recruitment Plan, especially in connection with the goals set for the hiring and permanence of local personnel, for the operation phase.	4. Progress reports of the Local Personnel Training and Recruitment Plan for the operation phase.	4. As part of the ESCR.
		5. Draft a Personnel Guidance Program considering the following issues: (i) prevention of gender violence; (ii) prevention of the sexual exploitation of women and minors; (iii) STD prevention measures; (iv) prevention of illegal drug and alcohol use; and (v) prevention of depression.	5. Personnel Guidance Program.	5. Prior to first disbursement.
		6. Submit periodic reports on the results of the implementation of the Personnel Guidance Program.	6. Progress reports on the Personnel Guidance Program.	6. As part of the ESCR.
2.3	Grievance mechanism	1. Draft an internal grievance mechanism that is accessible to all the employees, contractors and third parties; ensures anonymity, non-retaliation; and includes clear procedures to receive, address and respond to the grievances submitted.	1. Internal grievance mechanism for workers and contractors.	1. Prior to first disbursement.
		2. Report the grievances received from workers and contractors identifying the types and the responses provided.	2. Reports including updates on the grievances submitted by workers and contractors.	2. As part of the ESCR.
2.4	Gender equity	1. Prepare a Gender Equality Plan to achieve the inclusion of women at the	1. Gender Equality Plan.	1. Prior to first

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		different levels of the labor force and the reduction of any salary differences between men and women.		disbursement.
		2. Implement the Gender Equality Plan.	2. Reports on the Gender Equality Plan.	2. As part of the ESCR.
2.5	Health and safety	1. Prepare an Occupational Health and Safety (OHS) Plan including: (i) an OHS risks map; (ii) worker protection procedures; (iii) accident prevention procedures; (iv) labor safety indicators; (v) a description of the training program, and (vi) a personnel training schedule.	1. Occupational Health and Safety Plan	1. Prior to first disbursement.
		2. Implement the Occupational Health and Safety Plan.	2. Progress reports on the Occupational Health and Safety Plan.	2. As part of the ESCR.
		3. Submit investigation reports on accident causes and the measures to prevent them and improve the Project's health and safety management.	3. Reports on accident causes investigations.	3. As part of the ESCR.
2.6	Workers engaged by third parties	1. Include in the contracts with third parties provisions binding contractors and subcontractors to comply with the following Company management instruments: (i) Human Resources Policy; (ii) Code of Ethics; (iii) grievance mechanism; (iv) health and safety procedures; (v) Works Environmental Management Plan; (vi) Emergency Preparedness and Response Plan; (vi) Road Safety Plan; (vii) Compensation for Suppressed Vegetation Plan; (viii) Chance Find Procedure; (ix) E&S Works Management Plan; and (x) Organizational Capacity Plan adopted by the leader of the Project.	4. Contractual clauses.	4. Prior to first disbursement.
		2. Prepare a Suppliers Qualification and Acceptance Procedure allowing verifying that they: (i) comply with Paraguayan labor laws; (ii) have not violated any human rights; (iii) have legal integrity; and (iv) have in place environmental, health and safety procedures similar to those required by the Company.	5. Suppliers Qualification and Acceptance Procedure.	5. Prior to first disbursement.
		3. Implement the Suppliers Qualification and Acceptance Procedure.	6. Suppliers Qualification and Acceptance Procedure implementation report.	6. As part of the ESCR.
PS3: Resource efficiency and pollution prevention				
3.1	Pollution prevention	1. Prepare the E&S Works Management Plan, including programs for the: (i) management of demolitions and debris; (ii) construction material storage and handling; (iii) works site and temporary facilities management; (iv) hazardous products management; (v) landscape management; (vi) effluent and surface water management; (vii) earthworks management; (viii) air emissions and noise control; (ix) basic and public service network management; (x) management of solid waste generated during the construction works; and (xi) replacement of affected assets.	1. E&S Works Management Plan.	1. Prior to first disbursement
		2. Adopt the E&S Works Management Plan.	2. E&S Works Management Plan implementation reports.	2. As part of the ESCR.
		3. Submit an Effluent, Surface Water and Groundwater Monitoring Plan.	3. Effluent, Surface Water and Groundwater Monitoring Plan.	3. Prior to first disbursement.
		4. Implement the Effluents, Surface Water and Ground Water Monitoring Plan	4. Periodic reports on the Effluents, Surface Water and Ground Water Monitoring Plan.	4. As part of the ESCR.
		5. Prepare a Solid Waste Management Plan for the operation phase meeting	5. Solid Waste Management Plan for the operation	5. Three months prior to the

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		the requirements in the IFC's General Environmental, Health and Safety Guidelines for hospitals.	phase.	beginning of the operations.
		6. Implement the Solid Waste Management Plan for the operation phase.	6. Compliance reports of the Solid Waste Management Plan for the operation phase.	6. As part of the ESCR.
		7. Incorporate environment-friendly sanitary and hospital wastewater collection, treatment, and final disposal systems.	7. Sanitary and hospital wastewater collection, treatment, and final disposal systems.	7. Prior to first disbursement.
		8. Incorporate environment-friendly infrastructure for the segregation and temporary storage of solid waste and hazardous material.	8. Infrastructure for the segregation and temporary storage of solid waste and hazardous material.	8. Prior to first disbursement.
		9. Prepare a Herbicide Use Procedure including guidance on handling, PPE use, proper care during product application, and adequate storage and disposal of its packaging.	9. Herbicide Use Procedure.	9. Prior to first disbursement.
3.2	Greenhouse gases	1. Submit a Greenhouse Gas Emission Monitoring Program considering scope 1 and 2 emissions.	1. Greenhouse Gas Emission Monitoring Program	1. Prior to first disbursement.
		2. Submit the results of the Greenhouse Gas Emission Monitoring Program periodically.	2. Progress reports on the Greenhouse Gas Emission Monitoring Program.	2. As part of the ESCR.
3.3	Adaptation to climate change	1. Prepare a Climate Change Adaptation Plan identifying the specific measures that the Project shall take to protect itself from the effects of droughts and heat waves.	1. Climate Change Adaptation Plan.	1. Prior to first disbursement.
		2. Implement the Climate Change Adaptation Plan.	2. Climate Change Adaptation Plan progress reports.	2. As part of the ESCR.
3.4	Resource efficiency	1. Incorporate measures to bolster energy efficiency and optimize water resources utilization in the executive project of the medical center.	1. Report on energy efficiency and water consumption reduction measures.	1. Prior to first disbursement.
		2. Submit data on electric power and water consumption for the Project.	2. Water and electric power consumption data on the Project.	2. As part of the ESCR.
PS4: Community Health and Safety				
4.1	Infrastructure and equipment design and safety	1. Hire a specialized consultant to assess the compliance of the executive project with Paraguayan and international fire alert, prevention and fighting standards.	1. Compliance report .	1. Prior to first disbursement.
		2. Prepare a Road Safety Plan with recommendations on access roads adjustments from the traffic assessment and including provisions to reduce accident risks in the construction phase.	2. Road Safety Plan.	2. Prior to first disbursement.
		3. Implement the Road Safety Plan.	3. Reports on the implementation of the Road Safety Plan.	3. As part of the ESCR.
4.2	Security Personnel	1. Prepare a Security Plan including procedures for training security personnel on: (i) human rights; (ii) conflict management; (iii) adequate use of force; and (iv) non-violent communication techniques.	1. Security Plan..	1. Prior to first disbursement.
		2. Implement the Security Plan.	2. Progress reports on the Security Plan.	2. As part of the ESCR.
PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
6.1	Protection and conservation of biodiversity	1. Prepare a Vegetation Compensation Plan to offset vegetation loss at the Project site.	1. Vegetation Compensation Plan.	1. Prior to first disbursement.

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		2. Implement the Vegetation Compensation Plan.	2. Progress reports on the Vegetation Compensation Plan.	2. As part of the ESCR.
PS8: Cultural Heritage				
8.1	Chance finds procedures	1. Prepare Chance Finds Procedure.	1. Chance Finds Procedure.	1. Prior to first disbursement.
		2. Prepare a progress report with the results of the application of the Chance Finds Procedure.	2. Progress report.	2. As part of the ESCR