

Menorca Inversiones - PERU
Environmental and Social Action Plan (ESAP)

No.	Reference	Action Item	Product/Deliverable	Completion Date
PS 1: Assessment and Management of E&S Risks and Impacts				
1.1	Environmental and Social Management System	Enhance and maintain the Integrated Environmental, Social, and Health and Safety Management System (ESMS) in a way that, besides, shall be applicable to all the activities carried out by own or hired personnel.	Integrated ESMS document	As part of the first Project's Environment and Social Compliance Annual Report (ESCR).
		Name a person in charge for the integration of the Company's ESMS who shall control the development, implementation and follow up of all the environmental, social, and health and security management plans, programs, and procedures, including hired personnel and suppliers.	Appointment of the officer by the top management, with the definition of his or her Roles and Responsibilities within ESMS.	Before financial closing
1.2	Policy	Disclose the IMS' policy to all external stakeholders.	Evidence of external disclosure.	90 days after the closing of the credit contract.
		Periodically update ESMS's policy.	Record of the periodic updates of policies and procedures.	When necessary, as part of the Project's Environment and Social Compliance Annual Report (ESCR)
1.3	Identification of Risks and Impacts	Prepare the Project's Environmental Impact Declaration ("DIA").	Environmental Impact Declaration ("DIA") of the Project.	At least 30 days before the onset of the Project's construction.
		Obtain the approval of the Project's DIA.	Resolution of approval by the General Direction of Environmental Issues of the Ministry of Housing, Construction and Sanitation.	At least 30 days before the onset of the Project's construction.
		Develop the Social Diagnosis (SD) of the Project.	SD document.	At least 30 days before the onset of the Project's construction.
		Develop procedures to identify hazards, assess risks and impacts, and determine controls in all the Company's activities, processes, and sites, both at a corporate level and specifically for the construction phase of the Project.	<ol style="list-style-type: none"> Corporate procedures to identify hazards, assess risks and impacts, and determine controls in all the Company's activities, processes, and sites. Procedures to identify hazards, assess risks and impacts, and determine controls in all the activities, processes, and sites for the construction phase of the Project. Evidence of both procedures' implementation. 	<ol style="list-style-type: none"> 90 days after the closing of the credit contract. At least 30 days before the onset of the Project's construction. As part of the Project's ESCR.
		Develop and implement a procedure for consultation with stakeholders to proactively identify hazards.	<ol style="list-style-type: none"> Procedure for consultation with stakeholders. Implementation evidence. 	<ol style="list-style-type: none"> At least 30 days before the onset of the Project's construction. As part of the Project's ESCR.
		Develop and implement a procedure to identify the environmental and social risks in the Company's supply chain.	<ol style="list-style-type: none"> Procedure for environmental and social risk management in the supply chain. Implementation evidence. 	<ol style="list-style-type: none"> 180 days after the closing of the credit contract. As part of the Project's ESCR.
		Conduct a periodic review of the behavior of performance indicators associated to the IMS.	Review of the performance indicators.	As part of the Project's ESCR.
		Implement IDB Invest's "Gender Risk Assessment Tool" (GRAT) to avoid and manage gender-related risks in their operations.	Implementation evidence.	As part of the Project's ESCR
1.4	Exposure to Climate Change	Incorporation of elements for mitigating the effects of climate change into the design of the projects.	Certification by the Independent Engineer on the incorporation of mitigating elements into the design of the projects.	Previously to the onset of each project.

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1.5	Management Programs	Develop and implement an action plan to address risks for the community during the implementation of their projects.	1. Community Risk Action Plan 2. Evidence of implementation.	1. At least 30 days before the onset of the Project's construction. 2. As part of the Project's ESCR.
1.6	Monitoring and Evaluation	Develop and implement an internal environmental and social monitoring procedure including the verification of the compliance with E&S goals and key management indicators.	1. Monitoring procedure for the internal E&S management 2. Internal E&S monitoring reports.	1. As part of the first Project's ESCR. 2. Annually.
		Extend the monitoring and evaluation to E&S management with communities, suppliers and contractors.	Monitoring procedures for the external E&S management.	As part of the Project's ESCR.
1.7	Stakeholder Engagement	Prepare and adopt a procedure for the engagement of stakeholders in which the information to be distributed to the affected Communities includes: i) the results of the Company's performance; ii) statistics of the grievance system; and iii) a summary of the regular consultations with the affected Communities.	1. Stakeholder engagement procedure. 2. Evidence of implementation.	1. At least 30 days before the onset of the Project's construction. 2. As part of the ESCR
		1. Prepare and adopt a Project Disclosure Plan to the stakeholders. 2. Carry out at least one public Consultation to communicate DIA and SD results. 3. Disclose the existing Grievance Mechanism 4. Implement the Company's Stakeholder Engagement Procedure in the Project.	1. Project Disclosure Plan document. 2. Evidence of public consultation for the Project. 3. Evidence of disclosure of grievance mechanism. 4. Evidence of the Stakeholder Plan Implementation in the Project.	1. At least 30 days before the onset of the Project's construction. 2. At least 30 days before the onset of the Project's construction (virtually) and 30 days after as restrictions due to the COVID-19 pandemic are lifted (face-to-face). 3. At least 30 days before the onset of the Project's construction. 4. As part of the Project's ESCR.
PS 2: Labor and Working Conditions				
2.1	Grievance Mechanism	Disclose among labor intermediation and third-party workers the existing Grievance Mechanism (Ethics Line)	Evidence of disclosure and management of third-party workers' grievances.	At least 30 days before the onset of the Project's construction.
2.2	Occupational Health and Safety	Develop and implement an Occupational Health and Safety system (OHS) based on the risk analysis of the operating activities carried out by own and third-party workers (contractors and suppliers).	1. OHS system and applicable procedures. 2. Evidence of the OHS system implementation in the Project.	1. At least 30 days before the onset of the Project's construction. 2. As part of the Project's ESCR.
2.3	Supply Chain	Develop and implement a Suppliers policy. Develop and implement a Suppliers Management Procedure including: i) identification and management of risks and impacts of their main suppliers; ii) a training plan to help manage environmental and social issues; iii) performance monitoring for reviewing the procurement policy; and iv) design of programs for developing their suppliers' abilities.	1. Suppliers Policy 2. Evidence of policy implementation. 3. Supplier Management Procedures. 4. Evidence of the procedure implementation in the Project.	1. 180 days after the closing of the credit contract. 2. As part of the Project's ESCR. 3. 180 days after the closing of the credit contract. 4. As part of the Project's ESCR.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Greenhouse Gases	Maintain a log for GHG emissions.	Annual calculation of GHG emissions for all the Company's projects.	As part of the Project's ESCR.
		Incorporate energy efficiency and water use efficiency standards into the project design.	External verification.	As part of the first Project's ESCR.
3.2	Water Consumption	Obtain the "Water and outflow pipes technical feasibility" of the Project.	Approved water and outflow pipes technical feasibility.	At least 30 days before the onset of the Project's construction.
		Obtain the permits from the Water Local Authority (WLA) and from the Project Irrigation Board.	1. Permit by the Water Local Authority (WLA). 2. Permit by the Irrigation Board.	1. 180 days after the closing of the credit contract. 2. 180 days after the closing of the credit contract.
3.3	Pollution Prevention	Develop and apply the Environmental Management Plan (EMP) of the DIA including the prevention, mitigation or correction measures of potential impacts.	1. EMP 2. Evidence of the EMP implementation in the Project.	1. At least 30 days before the onset of the Project's construction. 2. As part of the Project's ESCR.

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PS 4: Community Health and Safety				
4.1	General Requirements	<ol style="list-style-type: none"> 1. Assess the risks for the community previously to the development of each of the projects. 2. Implement the management measures necessary according to the assessment of the risks for the community. 	<ol style="list-style-type: none"> 1. Report on the assessment of risks for the community; and 2. Evidence of measures implementation. 	<ol style="list-style-type: none"> 1. At least 30 days before the onset of the Project's construction. 2. As part of the Project's ESCR.
4.2	Community Exposure to Disease	Develop and adopt a procedure for preventing risks of exposure to COVID-19 during the project execution.	<ol style="list-style-type: none"> 1. Procedure for the prevention of risks of exposure to COVID-19. 2. Implementation evidence 	<ol style="list-style-type: none"> 1. At least 30 days before the onset of the Project's construction. 2. As part of the Project's ESCR.
4.3	Emergency Preparedness and Response	Develop an Emergency Preparedness and Response procedure specific for the Project including preparedness and response activities for Menorca, its contractors, visitors and communities.	Emergency Preparedness and Response Procedure for the Project.	At least 30 days before the onset of the Project's construction.
4.4	Security Personnel Requirements	Training to the Security Personnel of the projects on human rights according to the International Finance Corporation's (IFC) "Good Practice Handbook on the Use of Security Forces: Assessing and Managing Risks and Impacts, Guidance for Private Sector in Emerging Markets."	Evidence of Training.	As part of the Project's ESCR.
PS 8: Cultural Heritage				
8.1	Chance Find Procedure	Develop a Chance Find Management Procedure for the Project. Disclose the procedure to own and subcontracted workers. Ensure procedure implementation by the contractors.	<ol style="list-style-type: none"> 1. Chance Find management procedure. 2. Evidence of disclosure. 3. Follow up on contractors 	<ol style="list-style-type: none"> 1. At least 30 days before the onset of the Project's construction. 2. At least 30 days before the onset of the Project's construction. 3. As part of the Project's ESCR.