

**Environmental and Social Action Plan (ESAP)**  
**Orion Industrial Park and Free Trade Zone – EL SALVADOR**

No.	Aspect	Action	Deliverable	Delivery date
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>				
1.1	Environmental and Social Management System (ESMS)	1. Evaluate ESMS implementation.	1. ESMS Assessment Report.	1. Prior to First Disbursement and then in the Environmental and Social Compliance Reports (ESCR).
1.2	Organizational Capacity	1. Form an Occupational Health and Safety (OHS) Committee.	1. Minutes or internal resolution of the conformation.	1. 15 days prior to the operation of the Orion IP.
		2. Designate the Prevention Delegates for the new Orion IP.	2. Copy of the designation of the Delegates.	2. 15 days prior to the operation of the Orion IP.
1.3	Emergency Preparedness and Response	1. Prepare an Emergency and Evacuation Plan (EEP), for the construction phase of the Orion IP, including the following aspects: (i) specific emergency response procedures for natural hazards, human conflict, and technological hazards; (ii) qualified emergency response teams; (iii) emergency contacts and communication systems and protocols; (iv) procedures for interacting with local and regional authorities regarding health and emergency resolution; (v) permanent emergency response facilities and equipment; (vi) protocols for fire trucks, ambulances, and other emergency services and vehicles; (vii) evacuation routes and meeting points; and (viii) training exercises involving Orion IP and AIP personnel and other stakeholders and affected parties.	1. EEP for the Orion IP construction phase.	1. Prior to First Disbursement.

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		2. Prepare an Emergency and Evacuation Plan (EEP), for the O&M phase of the Orion IP, including the following aspects: (i) specific emergency response procedures for natural hazards, human conflict, and technological hazards; (ii) qualified emergency response teams; (iii) emergency contacts and communication systems and protocols; (iv) procedures for interacting with local and regional authorities regarding health and emergency resolution; (v) permanent emergency response facilities and equipment; (vi) protocols for fire trucks, ambulances, and other emergency services and vehicles; (vii) evacuation routes and meeting points; and (viii) training exercises involving Orion IP and AIP personnel and other stakeholders and affected parties.	2. EEP for the Orion IP O&M phase.	2. 30 days prior to completion of the construction phase.
		3. Submit a report on the implementation of the EEPs in the Orion IP.	3. Implementation report.	3. As part of the ESCR.
1.4	Monitoring and assessment indicators	1. Prepare a legal compliance matrix that includes: (i) the key performance indicators; (ii) a record of the fulfillment of contractual and local legal obligations; (iii) the competent authority in charge of granting authorizations or issuing permits; (iv) the date of issuance or effective date of each permit or authorization; (v) the person responsible within the Company for monitoring or compliance with each permit, and (vi) future compliance and communication procedures.	1. Compliance Matrix.	1. 120 days after signing the loan agreement.
		2. Adopt the Compliance Matrix.	2. Report on the implementation of the matrix.	2. As part of the ESCR.
1.5	Project's Regulatory Compliance	1. Prepare a consolidated annual report on the compliance status of: (i) all E&S and OHS legal requirements applicable to the Project; (ii) the progress of Comprehensive System actions against the defined KPIs; and (iii) the compliance	1. Environmental and Social Compliance Report (ESCR).	1. Annually over the life of the loan.

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		status with the IDB Invest Environmental and Social Sustainability Policy.		
<b>PS 2: Labor and Working Conditions</b>				
2.1	Occupational Health and Safety	1. Develop an Occupational Risk Prevention Management Program for the construction stage of the Project.	1. Occupational Risk Prevention Management Program for Orion IP for the construction stage.	1. 90 days after signing the loan agreement.
		2. Develop an Occupational Risk Prevention Management Program for the operation and maintenance (O&M) stage of the Project.	2. Occupational Risk Prevention Management Program for Orion IP for the O&M stage.	2. 90 days after signing the loan agreement.
		3. Implement the Occupational Risk Prevention Management Program.	3. Proof of Implementation of the procedure.	3. As part of the ESCR.
		4. Define the general rules for contractors and subcontractors performing work inside the Orion IP facilities.	4. Copy of the general rules for Orion IP contractors and subcontractors.	4. 15 days prior to the operation of the Orion IP.
		5. Adopt general standards for contractors and subcontractors.	5. Proof of Implementation of the procedure.	5. In each Environmental and Social Compliance Report.
2.2	Supply Chain	1. Update the Customer Contractor Labor Policy to require each supplier to comply with applicable labor, occupational health and safety, and environmental requirements.	1. Updated Customer Contractor Labor Policy.	1. 90 days after signing the loan agreement.

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		2. Develop a supplier and contractor selection procedure based on labor and OHS criteria set out in the corresponding legislation.	2. Supplier and contractor registration procedure.	2. 90 days after signing the loan agreement.
<b>PS 4: Community Health, Safety, and Security</b>				
4.1	Community Health and Safety	1. Develop, in coordination with local traffic authorities, a specific Road Safety Management Plan for Orion IP.	1. Road Safety Management Plan for Orion IP.	1. 90 days after signing the loan agreement.
4.2	Fire Protection System	1. Obtain certification for Orion IP stating that: (i) all Project facilities were constructed according to the approved life and fire safety system (L&FS) design; (ii) all equipment was installed according to the L&FS design; and (iii) all L&FS devices were tested as per international requirements.	1. Orion IP certification.	1. 15 days prior to the commencement of each facility's operation or occupancy.
4.3	External Security Policy and Protocols	1. In the agreements signed with security and surveillance companies, include provisions that allow AIP to: (i) conduct reasonable investigations to ensure that security personnel do not have a criminal record and have not engaged in abuse; (ii) verify the details of any required training on the use of force; (iii) verify any restrictions or procedures used for the use of firearms; and (iv) identify the details of environmental training and social awareness, including human rights.	1. Copy of the Agreements with the security and surveillance companies.	1. 60 days after signing the loan agreement.