

Sal de Vida – Argentina
Environmental and Social Action Plan – ESAP

No.	Aspect	Action	Deliverable	Delivery date
PS1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Policy	1. Update the environmental and social (E&S) policies to follow Good International Industry Practices.	1. Updated E&S policies	1. Prior to the first disbursement
		2. Disseminate the E&S policies.	2. Evidence of dissemination	2. Prior to the first disbursement
1.2	Identification of risks and impacts	1. For any future activity related to the Project that is not currently included in the existing ESIA's that are already approved or under revision by local authorities, the Company will conduct an integrated E&S impact identification and assessment study commensurate with the nature and scale of the proposed development's potential impacts, including the supply chain of the solar component.	1. Integrated study to identify and assess the environmental and social impacts	1. Within 3 months after signing the loan agreement
1.3	Cumulative impacts	1. Incorporate the recommendations derived from the Rapid Cumulative Impact Assessment (RCIA) into the Project's E&S management plans and procedures.	1. Updated Project E&S management plans and procedures	1. Within 4 months after signing the loan agreement
		2. Participate in possible sector and regional work groups focused on cumulative impact management.	2. Evidence of engagement	2. As part of the Environmental and Social Compliance Report (ESCR)
		3. Update the existing monitoring and management programs regularly to include actions to mitigate the cumulative impacts under the scope and responsibility of Alkern.	3. Updated monitoring and management programs	3. Within 4 months after signing the loan agreement
1.4	Management programs	1. Develop or update the following Environmental and Social Management Procedures: (i) Footprint minimization and management procedure; (ii) Chance finds procedure; (iii) Defensive driving management plan; (iv) E&S transportation management plan	1. Management Procedures and Plans	1. Within 4 months after signing the loan agreement
		2. SdV will analyze and correspondingly expand its integrated supplier control system ("EXACTIAN" for its Spanish acronym) to ensure that all off-site contractors and suppliers are included within the scope of the mandatory HSE requirements.	2. Updated EXACTIAN	2. Prior to the first disbursement
1.5	Organizational capacity and competency	1. SdV will enhance and supplement the E&S organizational capacity and competency by incorporating: (i) a senior biodiversity coordinator; (ii) a field senior community relations officer; and (iii) a water resources coordinator.	1. Organizational chart with the resulting configuration of Alkern's E&S team that is exclusively working on SdV and the résumés for the three required positions.	1. Prior to the first disbursement
		2. Maintain permanently qualified personnel capable of carrying out all required environmental, social, health, and safety actions.	2. Organizational chart with the E&S staff with details about titles and functions.	2. As part of the Environmental and Social Compliance Report (ESCR)
1.6	Monitoring and review	1. SdV will review the qualitative and quantitative numeric standards of their E&S management plans to ensure that all relevant aspects, including those for environmental noise and any release to the environment in general (liquid discharges of treated effluents and air emission from diesel generators) are aligned with the standards set forth in the WBG EHS General Guidelines and relevant aspects of the Mining WBG EHS Guidelines.	1. Updated E&S management plans	1. Within 10 months after signing the loan agreement

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1.7	Gender risks	1. Prepare a Gender Plan to: (i) look into gender risks in the light of an assessment of the female workers' safety, which considers isolated work positions, night shifts, work environment, transport and accommodation; and (ii) develop mitigation measures based on the results of the risk assessment.	1. Gender Plan	1. Within 6 months after signing the loan agreement
		2. Update the procedure to hire services to transport the personnel to the camp in order to guarantee that women can safely get off during the night shifts in places that are off the ordinary passenger route.	2. Procedure to hire services to transport the personnel to the camp	2. Within 4 months after signing the loan agreement
		3. Disseminate among carriers and employees the updated procedure to hire services to transport the personnel to the camp.	3. Evidence of dissemination	3. Within 6 months after signing the loan agreement
1.8	Stakeholder engagement	1. Prepare a Stakeholders Engagement Plan, including the Project areas of direct and indirect influence, so that it is aligned with the PS1 requirements and considers: (i) supporting the dissemination of relevant management plans; (ii) setting up a safe, respectful space for two-way communications with the stakeholders; (iii) encouraging continuous dialog and stakeholder engagement; (iv) strengthening the communications and culturally appropriate relations with the indigenous populations; (v) facilitating discussions with community representatives and other members.	1. Interest Groups and Stakeholders Engagement Plan	1. Within 3 months after signing the loan agreement
		2. Enhance the community investment plan for the areas of direct and indirect influence, focused on shared value activities that enable the creation of additional independent sustainable income sources and benefit the community members.	2. Enhanced community investment plan	2. Within 6 months after signing the loan agreement
1.9	External communication and grievance mechanisms	1. Update the Communication Plan to be aligned with the PS1 requirements. The plan must: (i) close the existing information gaps; (ii) encourage transparency regarding the Project activities; (iii) maximize access to information locally; (iv) support the awareness actions from the provincial government focused on the sustainable management of lithium resources; (v) increase the knowledge about the environmental and social impacts and the related adopted mitigation and management measures; and (vi) open dialog with all stakeholders.	1. Enhanced external communication plan	1. Within 3 months after signing the loan agreement
		2. Update the Community Grievance Mechanism to include procedures and specific provisions for all grievances related to acts of gender-based harassment and violence; and make sure it is culturally appropriate for the local indigenous communities.	2. Updated Community Grievance Mechanism procedure	2. Within 4 months after signing the loan agreement
		3. Disseminate the Ethics Channel in the Project website.	3. Evidence of the dissemination of the Ethics Channel in the Project website	3. Within 4 months after signing the loan agreement

PS 2. Labor and Working Conditions				
2.1	Grievance mechanism	1. Update the Labor Grievance Mechanism to: (i) receive grievances related to acts of gender harassment and violence; (ii) make sure all grievances related to acts of gender harassment and violence are victim-centered and properly addressed; and (iii) assure that the mechanism has especially trained personnel.	1. Labor Grievance Mechanism Procedure	1. Within 4 months after signing the loan agreement
PS3: Resource Efficiency and Pollution Prevention				
3.1	Water consumption	1. Conduct ecological flow studies of the Rio Los Patos, the vegas and lagoons in the area of influence of the Project, considering seasonal and longer-period variations as well as climate change effects, as part of the implementation of the water study roadmap ("WSR").	1. Study of the ecological flow of Los Patos river, Parinayu and Vega del Hombre Muerto flats, and Laguna Catal and Laguna Verde lagoons	1. Within 7 months after signing the loan agreement
		2. update the water balance incorporating the effects of climate change over the life of the operation, as part of the implementation of the WSR.	2. Updated water balance	2. Within 7 months after signing the loan agreement
		3. update and enhance the hydrogeological model running scenarios to estimate effects of the project on the shallow aquifer and surface waters.	3. Updated hydrogeological model	3. Within 7 months after signing the loan agreement
		4. Develop a comprehensive program to monitor surface and groundwater, which: (i) builds on the monitoring program approved in the ESIA; (ii) is designed to capture data that will show effects of pumping brine and/or raw water for the process, including potential drawdown effects on shallow surface waters and areas of valued habitat; (iii) includes, to the extent this is within the control of SdV, the survey of water sources and extraction points of any potential stakeholder in the vicinity of the Salar; (iv) be participatory in nature; and (v) is verified by an independent auditor and whose results are published annually, as part of the implementation of the WSR.	4. Comprehensive surface and groundwater monitoring program	4. Within 7 months after signing the loan agreement
		5. Design and implement an adaptive management plan for environmental protection on the basis of the updated model, its annual calibration, defined alert levels and obtained results from environmental surveys and the comprehensive water monitoring program implementation, as part of the WSR.	5. Adaptive management plan for environmental protection	5. Within 7 months after signing the loan agreement
		6. Conduct a superficial flow survey and baseline to document and assess whether existing or future infrastructure of the Project could alter natural flow patterns and water streams within the Los Patos delta environment and vegas and potentially reduce surface water runoff.	1. Technical report on the surface flow survey performed and its related baseline	1. Within 3 months after signing the loan agreement
		7. Based on the survey results design and implement install additional adequately sized culverts and other crossings drainage systems, including modifications or improvements to existing drains as appropriate, to ensure the surface water flow is not adversely altered.	2. Technical report that specifies the design and implementation plan for the culverts systems and crossings at the Salar.	2. Within 4 months after signing the loan agreement
		8. Document the legacy areas affected by past extraction of borates and ulexite that are not related to the Project.	3. Technical report that documents the legacy areas and the disruptions to the flow caused by the previous extraction activities unrelated to SdV.	3. Within 5 months after signing the loan agreement
		9. Include the assessment and monitoring of the effectiveness of any implemented installed road culverts, drainage systems and road crossings by including monitoring points upstream and downstream of these intersections.	4. Culverts and drainage systems monitoring program	4. Within 6 months after signing the loan agreement
		10. Publish annual results of the comprehensive program to monitor surface and groundwater, which will be verified by an independent auditor.	5. Evidence of disclosure	5. As part of the ESCR

PS4: Community Health, Safety and Security				
4.1	Security personnel	1. The Project will conduct a Security Risk Assessment to identify potentials risks to the project as well as potential risks posed by security arrangements to those within and outside facilities and assess whether such private security personnel are being vetted, hired, equipped, and trained adequately.	1. Technical report about the security risk assessment performed for the Project	1. Within 2 months after signing the loan agreement
		2. Develop, based on the risk assessment, a security forces management plan, which includes: (i) formal procedures to inform, respond to and record security incidents; (ii) training requirements that involve the prevention and management of acts of gender violence and harassment; and (iii) procedures to review the security background of the security services contractors.	2. Security forces management plan	2. Within 3 months after signing the loan agreement
PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
6.1	Protection and conservation of biodiversity	1. Update the biodiversity monitoring protocols to allow for better understanding the variability of the biodiversity values both spatially and temporally.	1. Updated monitoring protocols	1. Within 3 months after signing the loan agreement
		2. Develop a dedicated Restoration Plan for camps, roads, evaporation ponds and any other sites affected by soil compaction. The Restoration Plan will include methods for soil restoration and revegetation, targets, metrics and a timeline (prioritizing sites no longer in use, as possible) and will be developed by a botanical specialist.	1. Restoration plan	1. Within 5 months after signing the loan agreement
		3. Complete the Biodiversity Action Plan (BAP) to: (i) help select the suitable compensation measures; (ii) include internationally accepted compensation principles; (iii) include consultation actions with interest groups; (iv) include an assessment of losses and gains; (v) focus on the selected compensation in terms of biodiversity; (vi) identify the implementation partners; (vii) have an estimated budget and execution schedule; and (viii) include additional actions to promote and improve the conservation objectives and the effective management of the key biodiversity areas and the important bird areas.	1. Biodiversity action plan	1. Within 6 months after signing the loan agreement
		4. SdV will prepare and implement an Offset Management Plan ("OMP") with the final institutional arrangements and sustainable financing for the Project's selected offset, as well as roles and responsibilities for implementation and will include a Biodiversity Monitoring and Evaluation Program ("BMEP") to measure its effectiveness.	1. Offset management plan	1. Within 4 months after signing the loan agreement
		5. Adopt, based on the OMP, a BMEP to measure its effectiveness.	2. Biodiversity monitoring and evaluation program	2. Within 8 months after signing the loan agreement

PS7: Indigenous Peoples				
7.1	Indigenous Peoples	1. SdV will, in collaboration with Indigenous Peoples, develop an Indigenous Peoples Framework (IPF) applicable to indigenous communities, and households and other community members or groups within a 50 km radius, outlining: (i) actions to be implemented to avoid and minimize any potential adverse impacts; (ii) compensate any residual impact in a culturally appropriate manner, and (iii) take action to identify opportunities to enhance the positive effects of the project.	1. Indigenous Peoples Relations Framework	1. Within 3 months after signing the loan agreement
PS8: Cultural Heritage				
8.1	Preservation of cultural heritage	1. Prepare a Cultural Heritage Management Plan (CHMP) to include the following components: i) archaeological site protection program; ii) archaeological monitoring program; iii) chance find procedures; and iv) cultural heritage training program.	1. Cultural Heritage Management Plan	1. Within 6 months after signing the loan agreement
		2. Implement the actions arising from the CHMP.	2. Evidence of implementation	2. Within 12 months after signing the loan agreement