

**Environmental and Social Action Plan (ESAP)  
QUASAR EXPEDITIONS – ECUADOR**

No.	Action	Deliverable	Delivery Date
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>			
<b>1.1 Environmental and Social Management System</b>			
1.1.1	Develop a proposal for a specific Environmental and Social Management System (“ESMS”) that includes: (i) policies; (ii) procedures to identify, assess, and manage the potential environmental, social, OHS, and labor risks and impacts associated with each Project activity, as well as the activities of contractors and subcontractors; (iii) internal procedures to ensure compliance with the Environmental Management Plans (“EMPs”); (iv) organizational capacity and competency requirements, specifying duties and allocating responsibilities for implementing the system; (v) emergency preparedness and response protocols; (vi) key stakeholder participation methods or plans; (vii) external communication and grievance mechanisms; (viii) protocols for disseminating information to communities, decision making, and training; (ix) protocols for the assessment and continuous improvement of the ESMS; and (x) procedures for conducting periodic audits and inspections on environmental, social, and OHS requirements, and applicable environmental and OHS regulations in Ecuador.	ESMS Documents	No later than 180 days after signing the loan agreement.
1.1.2	Adoption of the ESMS.	Evidence of implementation.	As part of the Environmental and Social Compliance Report (ESCR).
<b>1.2 Identification of Risks and Impacts</b>			
1.2.1	For the Sustainable Operating Center (“SOC”), conduct an Environmental Impact Assessment (“EIA”) that includes an Environmental Management Plan (“EMP”) with the following aspects: i) procedures for managing and conserving endemic plant species that may be affected; reforestation with native species as part of the compensation measures; and the rescue and relocation of native wildlife species that may be affected; and ii) plans for: occupational health and safety; traffic; water availability and electricity self-generation assessment; and solid and liquid waste management.	EIA for the SOC.	30 days prior to starting the SOC’s construction phase.
1.2.2	Implementation of the EMP during construction of the SOC.	Evidence of implementation.	As part of the ESCR.
1.2.3	Develop a monitoring plan for the implementation of measures contained in the EMP.	Monitoring Plan copy.	30 days prior to starting the SOC’s construction activities.
1.2.4	Implementation of the monitoring plan.	Evidence of implementation.	As part of the ESCR.
1.2.5	Obtain a construction permit and other permits required by the Municipal Autonomous Decentralized Government (“ADG”) of Santa Cruz.	Copy of the construction permit.	Prior to starting construction activities for the new operating center.
1.2.6	Obtain the environmental permit for the new ship “Conservation”.	Copy of the environmental permit.	30 days prior to starting operation of the ship.
1.2.7	Include the obligation to use the Risk Identification and Assessment Matrix by job function in the contract with the contractor responsible for refurbishing the ship.	Copy of the refurbishing contract.	30 days prior to starting refurbishment of the ship.
1.2.8	Require contractors to periodically update the Risk Identification and Assessment Matrix by job function.	Updated Risk Identification and Assessment Matrix by job function.	As part of the ESCR.
1.2.9	Update the Emergency Plan for ships to include the most probable natural hazard risks to which its operations may be exposed, paying special attention to emergency preparedness and response systems, and coordination and communication with national alert systems.	Updated Emergency Plan.	No later than 180 days after signing the loan agreement.
<b>1.3 Organizational Capacity and Competency</b>			
1.3.1	Appoint an employee who is exclusively responsible for implementing the ESMS.	Copy of the appointment letter.	No later than 30 days after signing the loan agreement.

<b>1.4</b>	<b>Stakeholder Engagement</b>		
1.4.1	Implement a stakeholder consultation and participation process for construction of the SOC.	Evidence of the consultation process.	30 days prior to starting the SOC's construction activities.
1.4.2	Disseminate information related to the Project.	Evidence of dissemination.	As part of the ESCR.
<b>1.5</b>	<b>External Communication and Grievance Mechanisms</b>		
1.5.1	Develop an External Communications Procedure that includes: i) requirements for personnel to inform affected communities about the risks related to the Project and the corresponding action plans; ii) the definition of appropriate channels to inform communities; iii) the description of surveys to be conducted in order to understand what information is useful for communities; iv) how the Company must report its performance results; v) grievance resolution process statistics; and vi) specific guidelines for the publication of an environmental and social ("E&S") report, in line with best international practices such as the Global Reporting Initiative ("GRI").	Copy of the External Communications Procedure.	No later than 180 days after signing the loan agreement.
1.5.2	Implementation of the External Communications Procedure.	Evidence of implementation.	As part of the ESCR.
<b>PS 2: Labor and Working Conditions</b>			
<b>2.1</b>	<b>Internal Grievance Mechanism</b>		
2.1.1	Develop a procedure through which direct and indirect employees can raise queries, express concerns, or submit formal complaints that includes: i) how to submit grievances and complaints (phone number, website and email address); ii) the maximum period for providing a response to grievances; iii) the appointment of an employee or team to receive, register, validate, and investigate grievances, and provide solution alternatives; and iv) guidelines for monitoring and documenting grievances, as well as providing responses to employees.	Internal Grievance Procedure.	No later than 90 days after signing the loan agreement.
2.1.2	Implement a training program for all personnel on the use of this mechanism.	Minutes from training sessions.	No later than 180 days after signing the loan agreement and then as part of the ESCR.
<b>PS 3: Resource Efficiency and Pollution Prevention</b>			
<b>3.1</b>	<b>Resource Efficiency</b>		
3.1.1	Produce a greenhouse gas ("GHG") emissions inventory for all its operations in the Galápagos Islands.	GHG emissions inventory.	At the end of the first year after signing the loan agreement and then as part of the ESCR.
3.1.2	Maintain an up-to-date record of GHG emissions that includes an explanation of variations compared to the previous period, if applicable.	Annual GHG emissions record.	As part of the ESCR.
3.1.3	Quantify water consumption on the ships and at the SOC.	Water consumption quantification.	No later than 120 days after signing the loan agreement and then as part of the ESCR.
3.1.4	Define key performance indicators for water use on ships and at the SOC.	Performance indicators for water use.	No later than 180 days after signing the loan agreement.
<b>3.2</b>	<b>Pollution Prevention</b>		
3.2.1	Prepare a Waste Management Plan ("WMP") for the operation of the ship "Conservation".	Waste Management Plan ("WMP").	30 days prior to starting the operation phase of the "Conservation".
3.2.2	Implement the WMP for the operation of the ship "Conservation".	Evidence of implementation.	Upon starting the operation phase, and then as part of the ESCR.
<b>PS 4: Community Health, Safety, and Security</b>			
<b>4.1</b>	<b>Infrastructure and Equipment Design and Safety</b>		
4.1.1	Hire an independent professional qualified in life safety and fire protection ("LSFP") systems to verify that the designs of LSFP systems at the SOC comply with the international standards of the National	LSFP certification for the construction and operation of the SOC.	15 days prior to starting the SOC's operation phase.

	Fire Protection Association (“NFPA”) and the Life and Fire Safety (“L&FS”) requirements contained in the IFC Environmental, Health, and Safety General Guidelines.		
<b>PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>			
<b>6.1</b>	<b>Legally Protected Areas and Internationally Recognized Areas</b>		
6.1.1	Prepare a Biodiversity Impact Mitigation Plan that outlines measures to minimize the impacts generated by the construction and operation of the SOC.	Biodiversity Impact Mitigation Plan.	30 days prior to starting the SOC’s construction phase.
6.1.2	Implement the Biodiversity Impact Mitigation Plan.	Evidence of implementation.	As part of the ESCR.
<b>6.2</b>	<b>Supply Chain</b>		
6.2.1	Incorporate environmental and social criteria in the supplier selection procedure, including the following issues: i) identification and assessment of child labor or forced labor risks; ii) biodiversity conservation; and iii) safeguarding community health and safety.	Supplier selection procedure.	No later than 180 days after signing the loan agreement.
6.2.2	Prepare a training plan to strengthen suppliers’ E&S management capabilities, based on the Supplier Procedure, and identify opportunities for improvement (including advisory services and specific support).	Supplier E&S training plan.	As part of the ESCR.
6.2.3	Implement the supplier training plan.	Evidence of implementation.	As part of the ESCR.
6.2.4	Define standards for the procurement of environmentally friendly products that are environmentally friendly or form part of a circular economy.	Copy of the standards.	No later than 180 days after signing the loan agreement.
6.2.5	Develop a methodology for assessing suppliers’ E&S performance.	Methodology for assessing suppliers’ E&S performance.	No later than 180 days after signing the loan agreement.
6.2.6	Submit a summary of the supplier process.	Selection summary.	As part of the ESCR.