

**Soleco Energy Limited, Jamaica
Environmental and Social Action Plan (ESAP)**

Item No.	Reference	Action Item	Product / Deliverable	Anticipated Completion Date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Assessment and Management of Environmental and Social Risks	Acquire all the environmental and construction permits and licenses required as per local legislation.	Copies of all required permits and licenses.	Prior to order to proceed.
1.2	E&S Assessment and Management System	1. Develop a consolidated, Project-specific Environmental and Social Management System (“ESMS”), that includes: (i) an E&S Policy (ii) an organizational chart, (iii) risk and impact matrices for the construction and operation phases; (iv) all relevant Environmental, Social, Health & Safety management plans and procedures; and (v) an External Grievance Mechanism.	1. Project-specific ESMS documentation covering the construction and operation phases.	1. Prior to first disbursement.
		2. Adopt the Environmental and Social Management System (“ESMS”).	2. Evidence of ESMS implementation.	2. Prior to first disbursement.
1.3	Organizational Capacity and Competency	1. Prepare a consolidated E&S organigram for SEL and Grupotec describing E&S roles and responsibilities at the corporate and Project level, and showing lines of reporting authority.	1. Organigram included in the ESMS.	1. Prior to first disbursement.
		2. Appoint a dedicated E&S Specialist to manage ESMS development and implementation.	2. Evidence of appointment.	2. Prior to first disbursement.
		3. Appoint a Social Liaison Officer to manage the External Grievance Mechanism and the Social Engagement Plan.	3. Evidence of appointment.	3. Prior to first disbursement.
1.4	Emergency Preparedness and Response	Develop a Project specific Emergency Response Plan (“ERP”).	ERP as part of the ESMS.	Prior to first disbursement.
1.5	Stakeholder Engagement	Develop a Project-specific Stakeholder Engagement Plan (“SEP”) that includes: (i) a stakeholder map; (ii) a communication program; and (iii) a monitoring and review system.	SEP as part of the ESMS.	Prior to first disbursement.
1.6	External Grievance Mechanisms	Develop an External Grievance Mechanism (“EGM”) that allows for the filing of complaints anonymously.	EGM as part of the ESMS.	Prior to first disbursement.
PS 2: Labor and Working Conditions				
2.1	Labor and Working Conditions	1. Prepare an umbrella Human Resources (“HR”) Policy that explicitly prohibits the use of child and forced labor.	1. HR Policy as part of the ESMS.	1. Prior to first disbursement.
		2. Require principal contractors to comply with national labor laws.	2. Copy of the sections of the contracts with principal contractors in which clauses requiring compliance with all national labor laws have been included.	2. Prior to first disbursement.
2.2	Grievance Mechanism	Update the Internal Grievance Procedure to be applicable to all contractors and sub-contractors.	Internal Grievance Procedure as part of ESMS.	Prior to first disbursement.
2.3	Occupational Health and Safety	Update the OHSEMP to include (i) selection and control of contractors; (ii) Permits to Work (“PTWs”), (iii) site safety rules, (iv) COVID-19	OHSEMP as part of the ESMS.	Prior to first disbursement.

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		mitigation measures and (v) incident/accident analysis and reporting procedures and templates.		
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Pollution Prevention	Prepare and implement a Project-specific Solid Waste Management Plan ("SWMP") that includes reuse and recycling procedures for hazardous solar PV wastes.	SWMP as part of the ESMS.	Prior to first disbursement.
PS 4: Community Health, Safety, and Security				
4.1	Community Health and Safety	Prepare and implement a Project-specific Traffic Management Plan ("TMP").	TMP as part of the ESMS.	Prior to first disbursement.
4.2	Security Personnel	Update the Site Security Plan ("SSP") to be Project-specific and aligned with Good International Industrial Practice (e.g., Voluntary Principles on Security and Human Rights).	SSP as part of the ESMS.	Prior to first disbursement.