

METROPOLITANO (26820)
Environmental & Social Action Plan

#	Action	Responsible	Deliverables	Deadline
1	<u>Develop and implement an integrated management system for social and environmental affairs, quality, and occupational health and safety management (ESMS).</u> Establish an integrated management system tailored to the Company size, and based upon internationally recognized management systems (e.g. ISO 9001-2000, ISO 14000, and OHSAS 18000). The management system will address identified environmental, human resources, safety of radiation sources, and occupational health and safety issues associated with operations, and social impacts and risks of all existing and future operations. The Company will design the ESMS system to comply with Nicaragua regulations and IFC policies and performance standards. The ESMS will include stipulations for monitoring of environmental, social, health and safety of radiation sources (consistent with IFC EHS Guidelines and international standards for the safety of radiation sources), and for reporting back to IFC. It will also specify operating policy requirements as well as basic procedures that must be in place for quality control and compliance during construction as well as during the operation of the Cancer Centre (pollution loads, solid	METROPOLITANO	a) Upgraded management system operational, including include stipulations for monitoring of environmental, social, health and safety of radiation sources (consistent with IFC EHS Guidelines and international standards for the safety of radiation sources), and for reporting back to IFC. It will also specify operating policy requirements b) Provide to IFC specific ESMS operating policy requirements as well as basic procedures for the quality control and compliance during construction as well as during the operation of the Cancer Centre c) Provide IFC with a copy of the internal memorandum to formalize the managerial duties for environmental and social performance in all operations and making a change in the title name to "Operations and Environmental Corporate Management" d) Provide IFC with copies of the training materials and a work plan for the implementation of the training programme on Environmental and Social issues for current and new employees	a) 2 years after signing of Loan Agreement b) 9 months after signing of Loan Agreement c) Condition of Disbursement d) 9 months after signing of Loan Agreement e) 6 months after signing of Loan Agreement f) 6 months after signing of Loan Agreement

	waste, safety management of hazardous materials, etc.). The Company will retain an experienced scientific/technical professional in radiation protection to supervise the construction of the Cancer Centre. Metropolitan will formalize the managerial duties for environmental and social performance in all operations by making a change in the title name to "Operations and Environmental Management". Metropolitan will implement a training programme on Environmental and Social issues for its workforce, and as part of the content of the induction process for new employees. The Company will implement a formal system for monitoring and reporting environmental and social issues to senior management.		e) Present IFC the formal system for monitoring and reporting environmental and social issues to senior management f) Provide IFC with written evidence that an experienced scientific/technical professional in radiation protection has been retained to supervise the construction of the Cancer Centre	
2	Update Human Resources Policy: Metropolitan will update its human resources policy in accordance to Nicaragua labour laws and regulations and IFC standards, to specifically include reference to non-discrimination, freedom of association and collective bargaining, and will submit the policy to IFC for review. The Company will also develop and implement a formal employee grievance redress mechanism and will further disseminate the grievance process as part of their ESMS	METROPOLITANO	a) Provide IFC with the updated human resources policy for review b) Provide to IFC a copy of the grievance redress mechanism for employees, and the dissemination process	a) 9 months after signing of Loan Agreement b) 6 months after signing of Loan Agreement
3	Operational Safety Plan for site infrastructure: This plan will include the implementation of pavement markings, traffic signals, regulatory	METROPOLITANO	a) Present the site Operational Safety Plan for review b) Operational Safety Plan implemented	a) 6 months after signing of Loan Agreement b) 9 months after signing of Loan Agreement

	signs, warning signs, and emergency exits signs, according to international standards, to ensure safety of the workforce and clients.			
4	Solid and Hazardous Waste Management: The Company will present a plan for IFC's approval to dispose the solid waste in an environmentally sound manner (such as a sterilization system for infectious waste or other), and waste segregation. The Company will ensure that the plan is in compliance with regulatory limits of Nicaragua and IFC guidelines. Metropolitano will ensure that the activity and volume of any radioactive waste that results from the sources for which they are responsible be kept to the minimum practicable, and dispose of in accordance with IFC EHS Guidelines and the International Atomic Energy Agency international Standards for safety use of radiation sources. The Company will ensure that the waste managed will be segregated if appropriate by differences in factors such as radionuclide content, half-life, concentration, volume and physical and chemical properties, taking into account the available options for waste disposal. Metropolitano will ensure that radioactive substances are not discharged to the environment unless the discharge is within limits authorised by the Regulatory Authority.	METROPOLITANO	Submit to IFC the solid waste and radioactive waste management plan to IFC for review	9 months after signing of Loan Agreement
5	Community Engagement Plan: Metropolitano will develop a formal plan for community engagement and	METROPOLITANO	a) Present to IFC a copy of the corporate community engagement community	a) 9 months after signing of Loan Agreement b) 9 months after signing of Loan

	grievance mechanism, including a monitoring system and the ability to express concerns about acts of security personnel, and will ensure it is clearly communicated by posting on the company website and included in relevant written public communications. The Company will provide written information to IFC showing that an Emergency Planning and Response plan (EPR) has been developed.		engagement and grievance mechanism, including the implementation and public information plan for review b) Provide IFC with the Emergency Planning and Response plan (EPR) for review	Agreement
6	<u>Sustainable Water Management Plan:</u> Metropolitano will: a) Develop a water management plan to implement a water conservation programme to reduce the impact on groundwater. The plan will be submitted for IFC's approval. It will include policies and procedures on sustainability of water resource management to be included in the ESMS b) Install remote control computer-based groundwater level monitoring tool in the operating well c) Implement the water management plan d) Provide a hydrogeological assessment of groundwater, including reasons (supported by detailed technical data) why the aquifer use can be considered sustainable in the long term	METROPOLITANO	a) Water management and implementation plan presented to IFC for approval, showing the ESMS new policies and procedures on quality and sustainability of water resource management b) Provide IFC with the proof of certification from supplier that a remote control computer-based groundwater level monitoring tools has been installed in the well c) Water conservation and management plan implemented in full d) Provide IFC with hydrogeological assessment	a) 9 months after signing of loan Agreement b) 6 months after signing of loan Agreement c) Two years after signing of loan agreement d) 6 months signing of loan agreement