

Duoc 28539
Environmental & Social Action Plan

#	Action	Deliverables	Deadline
	PS-1		
1	<u>Upgrade the management system for social and environmental affairs, quality, and occupational health and safety management.</u> Duoc will upgrade its management system encompassing social, occupational health and safety, human resources, and environmental affairs management for all its operations. The upgraded Environmental and Social Management System (ESMS) shall comply with Chilean regulations and IFC policies and performance standards. The ESMS will also specify operating policy requirements as well as basic procedures that must be in place for quality control and compliance during construction and operational phases (pollution loads, solid waste, occupational health and safety, life and fire safety, facilities for the handicapped, management of hazardous materials, etc.). Duoc will implement a formal system for monitoring and reporting social and environmental issues to senior management and for reporting back to IFC. Consistent with the requirement of Performance Standard 1, Duoc will develop a corporate formal system for community engagement and grievance mechanism, and will ensure it is clearly communicated by posting on Duoc's website and including in relevant written public communications at the facilities.	a) Provide IFC with detailed program components, organizational chart, funding information, implementing management systems procedures, and activities schedule. b) Upgraded management system operational, including stipulations for monitoring of environmental, social, human resources and health and safety issues. It will also specify operating policy requirements. c) Present IFC the formal system for monitoring and reporting environmental and social issues to senior management and to IFC. d) Provide to IFC specific ESMS operating policy requirements as well as basic procedures for the quality control and compliance with social and environmental issues during construction. The ESMS will ensure that new buildings be designed and operated in full compliance with Chilean building codes, and in accordance with an internationally accepted life and fire safety standard as described in IFC Environmental, Health and Safety general guidelines. e) Provide to IFC specific ESMS operating policy requirements as well as basic procedures for the formal corporate system for community engagement and grievance mechanism, ensure it is clearly	a) 3 months after signing of Loan Agreement. b) 2 years after signing of Loan Agreement. c) 9 months after signing of Loan Agreement. d) Condition of first disbursement. e) 9 months after signing of Loan Agreement.

		communicated to communities neighboring all campuses by posting on Duoc's website and included in relevant written public communications at the facilities; and, provide adequate evidence of procedure incorporation into management systems procedures manuals; and, dissemination of the procedure.	
2	<u>Establish Environmental and Social Management Unit.</u> Duoc will formalize the managerial duties for environmental and social performance in all corporate operations.	Provide IFC with a copy of the internal memorandum to formalize the managerial duties for environmental and social performance.	Condition of Disbursement.
3	<u>Training Program for the Workforce:</u> Duoc will update its human resources "Induction Document" and will implement a training program on Environmental and Social issues as part of the Induction for new employees. Such training will also be provided to current professors and employees.	Provide IFC with copies of the training materials and a work plan for the implementation of the training program on environmental and social issues and provide adequate evidence of procedure incorporation into management systems procedures manuals.	9 months after signing of Loan Agreement.
	<u>PS-2</u>		
4	<u>Develop Corporate Human Resources Policy Management System(s) Procedures(s):</u> Duoc will develop a corporate human resource policy management system procedures and labor contracting specifications to ensure full compliance with labor law and regulations in Chile and IFC Performance Standard 2. The update shall specifically include reference to nondiscrimination, freedom of association and collective bargaining, and safeguards to ensure that child labor and forced labor is not used directly or through contractors, and will submit the policy to IFC for review. The corporate human resources policy will apply to all campuses and will be implemented	a) Provide IFC with the human resources policy for review. b) Provide adequate evidence of procedure incorporation into management systems procedures.	a) 3 months after signing of Loan Agreement. b) 9 months after signing of Loan Agreement.

	and managed by the Human Resources Division. Duoc will communicate the policy document to all current employees, and those contracted in the future as part of the induction process.		
5	<u>Develop Corporate Employee Grievance Mechanism (EGM) Management System(s) Procedure(s).</u> Modify human resources policy and procedures to develop and formalize a corporate employee grievance mechanism, to be managed by the Human Resources Division and included in the integrated ESMS as part of labor management practices and efforts to achieve transparency in compliance with Performance Standard 2. Duoc will submit the grievance policy to IFC for review. Duoc will further disseminate the grievance process as part of its ESMS. Duoc will review the human resources policy to include the formalized employee grievance mechanism.	a) Submit copy of procedure and/or revised HR Manual to IFC demonstrating incorporation for EGM. b) Confirm that information regarding the EGM has been disseminated to employees. c) Provide adequate evidence of procedure incorporation into management systems procedures manuals; and, dissemination of the procedure.	a) 6 months after signing of Loan Agreement. b) 9 months after signing of Loan Agreement. c) 9 months after signing of Loan Agreement.
6	<u>Emergency Contingency Plan:</u> Duoc will develop and implement a training plan to ensure that all students and employees are knowledgeable of existing emergency procedures and emergency contingency plans, including evacuation routes. The emergency procedures will be communicated to parents and the community by posting on Duoc's website.	a) Present to IFC the Safety Training Plan for review. d) Confirm that information regarding the emergency procedures has been disseminated to employees, parents and public. e) Provide adequate evidence of procedure incorporation into management systems procedures manuals; and, dissemination of the procedure.	a) Condition of Disbursement. b) 6 months after signing of Loan Agreement. c) 9 months after signing of Loan Agreement.
7	<u>Fire Drills:</u> Duoc will perform three fire drills per annum (two partial and one general) in all corporate operating campuses.	Present IFC the report of the fire drills at each campus, and the quality control report for all fire equipment.	Annually in the AMR.
8	<u>Supervision of Duoc's supply chain contractors:</u> Duoc will develop more	Provide IFC with the supervision plan for review and provide adequate	3 months after signing of Loan Agreement.

	rigorous reporting requirements and introduce pertinent sections in contracts, in order to ensure that supply chain contractors are in compliance with: payment of workers' legal benefits; timely payment of wages; occupational safety regulations, including provision of potable water and personal protective equipment, and ILO Conventions 138 on Minimum Age and 182 on Worst Forms of Child Labor.	evidence of procedure incorporation into management systems procedures manuals; and, dissemination of the procedure.	
9	<u>Storage of food and chemical cleaning items in all catering facilities:</u> Duoc will present and implement a corporate plan to IFC that will include supervision of adequate storage and handling of food and chemical cleaning items in all catering facilities.	Provide IFC with the supervision plan for review and provide adequate evidence of procedure incorporation into management systems procedures manuals; and, dissemination of the procedure.	9 months after signing of Loan Agreement.
10	<u>Operational Safety Plan:</u> The plan will include the implementation in all campuses of further improvements in the display of signals and emergency warning devices to allow clear identification of evacuation routes and ensure safety of students, public, and workforce. This plan should include pavement markings, wall signals, warning signs, and devices, according to international standards, to indicate evacuation routes and alternate means of escape, for people to gather and to ensure that everyone has left the danger zone. Duoc will provide third party certification by a qualified professional acceptable to IFC that the design and construction of life and fire safety systems for Maipu and all new buildings comply with the specifics of IFC life and fire safety guidelines.	a) Provide adequate written and photographic evidence of implementation of all signals and emergency warning devices to allow clear identification of evacuation routes and ensure safety of the students, public, and workforce. b) Certification to be prepared and submitted to IFC by the qualified third party professional engaged.	a) 9 months after signing of Loan Agreement. b) 3 months after signing of Loan Agreement.
	<u>PS-3</u>		
11	<u>Implement Energy Management Plans for all Operations</u>	Demonstrate ongoing activities to collect data and prepare management reports on principal energy indicators, quantities used during the year,	One year after signing of loan agreement, and report annually in AMR.

		reductions from previous years, activities undertaken to reduce energy use, efforts to motivate employees and stimulate ideas for reduction of energy use in all campuses.	
	PS-6		
12	<u>Prepare Management System Procedure Addressing Pest Management for Duoc Operations:</u> Duoc has agreed to eliminate, as feasible, WHO Class 1a and 1b chemical formulations for pesticides in their premises. Duoc will ensure that contractors and suppliers are in compliance with providing adequate personal protection equipment, will provide to IFC the protocol used for cholinesterase testing of workers applying pesticides, and will inform if there is any rotation policy of these workers.	a) Present to IFC the corporate proposal to upgrade the pest management strategy in all campuses, provide adequate evidence of procedure incorporation into management systems procedures manuals; and, dissemination of the procedure. b) Provide to IFC the protocol for cholinesterase analysis for workers in contact with pesticides. c) Each year include the cholinesterase results in the AMR. d) Inform IFC if there is any rotation policy of workers in contact with WHO Class 1a and 1b pesticides.	a) 9 months after signing of Loan Agreement. b, c, d) Report annually in AMR.
	PS-8		
13	<u>Cultural heritage protection:</u> Duoc will develop and implement a plan to preserve the buildings at Alonso de Ovalle in Santiago and Luis Cousinio in Valparaiso and report progress to IFC annually. The plan will include continuing maintenance of the two historic buildings, and the retrofit of life and fire safety systems and equipment to comply with IFC general environmental, health, and safety general guidelines.	a) Present to IFC the Refurbishment Plan for the buildings at Alonso de Ovalle in Santiago and Luis Cousinio in Valparaiso. b) Provide adequate evidence of procedure incorporation into management systems procedures manuals; and, dissemination of the procedure. c) Report annually progress to IFC.	a) 9 months after signing of Loan Agreement. b) One year after signing of loan agreement. c) Report annually in AMR.