

Harmon Hall (29753)
Environmental and Social Action Plan

#	Action	Deliverables	Deadline
	PS-1 Social and Environmental Assessment and Management System		
1	<u>Corporate Management System for social and environmental affairs, and occupational health and safety management:</u> - Harmon Hall will develop, implement, and maintain a corporate management system for their owned and franchised schools encompassing social, occupational health and safety, human resources, and environmental affairs management. The first step will be to identify and document the environmental and social impacts of Harmon Hall operations. The ESMS will comply with country regulations, IFC Performance Standards and EHS Guidelines. The ESMS will include a formal system for monitoring, and reporting social and environmental issues to senior management, and onward to IFC in the form of an Annual Monitoring Report. - Harmon Hall must appoint a company representative to lead the development, implementation, and maintenance of an Environmental and Social Management System (ESMS). - The ESMS should establish an ongoing employee training program covering environmental and social issues based on the responsibilities and impacts of the employee's activities. It should also include training for those employees in charge of the community engagement mechanism (i.e., the facility directors). - Harmon Hall will develop and document a policy for the selection of new sites for schools. This policy will include social and environmental criteria (e.g., buildings with sufficient parking to prevent blocking of neighboring garages, buildings with adequate Mexican and NFPA standards for Life and Fire Safety, to the extent possible and feasible, waste water treatment). It will also specify that use of cultural heritage sites are to be avoided for new school locations.	a) Provide copy of the formal communication appointing person that will lead the implementation of the ESMS. b) Provide implementation framework for the ESMS that includes: organizational chart, management systems procedures with respect to environmental and social issues (including but not limited to HR, to the extent possible and feasible waste water treatment, impacts on location of facilities to neighbors, criteria for site selection, Life and Fire Safety, cultural property, training of employees and community and employee grievance mechanisms) activities schedule, and stipulations for monitoring and reporting. c) Prepare and provide an Annual Monitoring Report (AMR) that addresses environmental and social issues as well as training activities for the next year. d) Provide a report that documents that the ESMS is operational. e) Provide a copy of the new site selection policy.	a) Condition of disbursement b) Six months after signing the loan agreement c) On an annual basis d) One year after signing the loan agreement e) Six months after signing the loan agreement
	PS-2 Labor and Working Conditions		
2	<u>Human Resource Policy and Management:</u> Harmon Hall will prepare a summary of the Human Resources Policy, and will make it available to the employees (e.g., placing a copy in every teacher's room). The policy will also include a non-discrimination and equal opportunity statement. This summary will be updated as the procedures that integrate it change. It will also reference the	a) Provide a copy of the summary of the Human Resources Policy. b) Provide a copy of the internal communication instructing the facility directors to publish the summary Human Resources Policy c) Provide a copy of the internal communication	a) Six months after signing the loan agreement b) Six months after signing the loan agreement c) Six months after signing the loan agreement d) Six months after signing the loan agreement

	Golden Compass competency model. - Copies of the internal work regulation are to be made available for review by the employees. A copy of this document should be available in the office of each facility director. - Harmon Hall will develop and implement a formal employee grievance mechanism and communicate it to the employees.	sending the internal work regulation to the facility directors and instructing them to notify the employees that it is available for their review. d) Provide a copy of the documents formalizing the employee grievance mechanism (e.g., policies, procedures, formats, etc.). e) Provide a copy of the internal communication notifying the employees about the employee grievance mechanism.	e) Six months after signing the loan agreement
3	<u>Protecting the Work Force:</u> - Harmon Hall will develop a contractor selection policy. This policy will require the contractor to certify that no child or forced labor is used in any of the work they perform for Harmon Hall, and that all of the contractor employees have social security services. - The policy will also include a statement that pest control contractors must use only low toxicity chemicals.	Provide a copy of the contractor selection policy.	Six months after signing the loan agreement
	PS-3 Pollution Prevention and Abatement		
4	<u>Emergency Preparedness and Response:</u> - Harmon Hall will ensure that all its facilities have an updated Civil Protection Plan, inclusive of a first aid training program, and a plan for firefighting (i.e., use of extinguishers and evacuation brigades). - Harmon Hall will install enough evacuation route signs so that one is visible from every point in the facilities; fire extinguishers must be inspected by a certified contractor on an annual basis and recharged every two years. - Emergency exits must be clearly identified, they must open towards the exterior and through doors affixed with a panic bar. - The training program mentioned in PS1, to be included in the Annual Monitoring Report, must also include the training procedures for the emergency brigades that are staffed by facility employees. - The policy for the selection of new (leased) sites will include availability of adequate emergency exits (including those that would facilitate the evacuation of persons in wheel chairs) and the availability of functional fixed firefighting	a) Provide copies of the stamped submittal letters for all the facilities and copies of the plan for the three largest facilities. b) Provide evidence of 2010 employee training activities on first aid and use of fire extinguishers. c) For several locations, provide copies of the facility layout showing the location of the evacuation route signs and the location of the fire extinguishers. d) Provide copies of the fire extinguisher inspection/re-charge services invoices. e) Provide photos of the emergency exits for each facility. f) Provide a copy of the new site selection policy. g) Provide a copy of the contractor selection policy.	a) Six months after signing the loan agreement b) Nine months after signing the loan agreement c) One year after signing the loan agreement d) One year after signing the loan agreement e) One year after signing the loan agreement f) Six months after signing the loan agreement g) Six months after signing the loan agreement h) One year after signing of the loan agreement

	systems and facilities should have waste water treatment, to the extent possible and feasible. - The contractor selection policy mentioned in PS2 will include a statement that pest control contractors must use only low toxicity chemicals. - Harmon Hall will engage a third party, approved by IFC, to audit the Life and Fire Safety (L and FS) systems of a representative sample of its facilities (of priority are all K-12 schools, those with children (under 16 years) and all their owned facilities, and a sample number to be agreed by IFC but no less than 25% of their franchised facilities). Harmon Hall will subsequently develop a corrective action plan to address deficiencies and recommendations specified in the audit report(s).	h) Provide a copy of the third party audit report (All K-12 facilities, all facilities catering to children (under 16 years), all owned facilities and a sample of franchised facilities); and a corrective action plan to address deficiencies and recommendations specified in the audit report(s).	
	PS 4 Community Health, Safety, and Security		
5	<u>Community Grievance Mechanism:</u> Harmon Hall will prepare a formal community engagement mechanism to be used in all its facilities, this will include the means Harmon Hall will use to let the community know the existence of the mechanism and the policies/procedures to attend to any community complaints.	Provide a copy of the documents formalizing the community grievance mechanism (e.g., policies, procedures, formats, etc.).	Six months after signing the loan agreement
	PS-8 Cultural Heritage		
6	<u>Project Use of Cultural Heritage:</u> - The new site selection policy (as mentioned in PS1) will include a statement stipulating a company policy to preferably avoid buildings declared as cultural heritage sites for new schools. - Should Harmon Hall select a cultural heritage site for a new school, the company will have a procedure regarding the use of such buildings (e.g. including the required permits, and to what level the corporate visual identity could be altered to preserve the building).	Provide copies of the new site selection policy, inclusive of the procedures for the use of building identified as a cultural heritage site.	Six months after signing the loan agreement