

CNO Surety Bond Guarantee Facility – Environmental and Social Action Plan (ESAP)

Issue	Actions	Timing	Responsible / Cost
1.- Existing CNO Integrated Sustainability Policy and Directives, do not cover Community Health, Safety and Security nor Biodiversity Conservation and Sustainable Natural Resource Management to the level of detail to meet PS4 and PS6 requirements.	1.1.- Perform a detailed gap-analysis between its current Sustainability Policy and supporting Integrated Sustainability Management System / Manual and IFC's PS4 on Community Health, Safety and Security and PS6 on Biodiversity Conservation and Sustainable Natural Resource Management. 1.2.- Based on this gap analysis, CNO will commit to develop additional "orientation" or "guidance" to complement its existing plans and procedures to assure these aspects are fully assessed for all underlying projects and managed in full compliance with IFC PS.	1.1.- Gap-analysis performed 3 months after issuance of first surety bond – guarantee 1.2.- New guidelines 12 months after issuance of the first surety bond guarantee.	Corporate CNO's ESHS Department.
2.- CNO's existing ISMS environmental and social impacts and risks categorization is not fully compatible with that of IFC. CNO is willing to engage in High Reputation Risk (HRR) Category A project in that the IFC would typically be reluctant to finance.	2.1.- Building on CNO's existing Sustainability Policy and supporting Integrated Sustainability Management System (ISMS) and Manual, CNO will develop a customized Facility Environmental and Social Impacts and Reputation Risk Management Scheme (RMS), in form and content satisfactory to the IFC. The RMS will outline: (a) Clear Eligibility Criteria, including definition of HRR. (b) ESHS Screening (c) ESHS Requirements:	2.1.- Prior to issuance of the First Surety Bond Guarantee.	Corporate CNO's ESHS Department.

	(d) Describe any additional ESHS Risk Management, Monitoring and Reporting required to assure compliance with IFC Policy and Performance Standards on Environmental and Social responsibility.		
3.- Even though the Code of Ethics clearly prohibits any type of discrimination at the workplace, the statistics showed a marked male-workforce bias (90% male), including an even more marked male bias at the Directors levels where 97% of the Directors are male. This does not respond to an articulated discrimination policy but to the nature of the construction business. However there is room for improvement.	3.1.– CNO will demonstrate that the gender gap is being reduced on a yearly basis.	3.1.- Present a yearly report on how gender inequality is being treated.	CNO HHRR
4.- GHG inventory	4.1.- Provide annual GHG inventory for all projects under the Facility.		Corporate CNO's ESHS Department