

Medanito S.A. Environmental and Social Action Plan (ESAP)

Task (include a short but specific description of the requirement to be met by the project proponent)	Indicator of Completion (Describe objective evidence to be supplied to IFC)	Required Completion Date (Calendar date, condition of disbursement, etc.)
PERFORMANCE STANDARD 1 – SOCIAL AND ENVIRONMENTAL ASSESSMENT AND MANAGEMENT SYSTEMS		
1. Gap Analysis of Existing EHS Management System Task: Hire an international consultant to conduct a gap analysis of the existing EHS Management System, (including existing Elements, Components, Plans and Procedures) for compliance with the Performance Standards.	Copy of Gap Analysis	6 months after first disbursement
2. EHS Management System Task: Based on the findings of the Gap Analysis upgrade the existing EHS Management System for compliance with the Performance Standards and EHS Guidelines.	Copy of ESHS MS Elements, Plans and procedures to satisfaction of IFC	12 months after first disbursement
3. Social Management System Task: Hire a senior social consultant with experience in the application of IFC standards to work with the company in the development and implementation of the 'Social' Component of the EHS Management System including the Stakeholder Engagement Framework, Grievance Procedure and Land Use Compensation Procedure.	Provide TOR for assignment and CV of consultant	6 months after first disbursement
4. Social Management System Task: Develop and implement the "Social" component of the ESHS MS including the necessary Policy, Elements and Plans and Procedures to manage current and future risks from the project.	Copy of ESHS MS Structure and Auditing Procedure	12 months after first disbursement
5. Community Engagement Framework Task: Develop and implement a Community Engagement Framework to address the needed stakeholder engagement activities for compliance with the Performance Standards and the environmental	Copy of Framework	12 months after first disbursement

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and social risks associated with the dump area in Cutral-Co, in form and content acceptable to IFC. Furthermore the Community Engagement Framework will include a plan for dissemination of ESIA findings (and result of the audit in action 6) to local communities and stakeholder.		
6. Existing Concessions Task: Hire an international consultant with experience in the application of IFC Performance Standards to carry out an audit for compliance of the various concessions with the Performance Standards and applicable EHS Guidelines.	Provide TOR for consultant to satisfaction of IFC Audit report for each concession to satisfaction of IFC Documentation of closure of gaps identified	6 months after first disbursement 1 concessions per year with first submittal 12 months after first disbursement 6 months after audit report of concession is submitted
7. Future activities in existing concession or new concessions Task: For all future activities to be carried out by Medanito in any of their concessions develop ESIA's which are in compliance with the Performance Standards and applicable EHS Guidelines.	Provide ESIA compliant with the Performance Standards and EHS Guidelines to satisfaction of IFC	2 months before any new activities are carried out in the area
8. Grievance Procedure Task: Prepare and implement the Grievance Procedure for farmers and neighbors in the vicinity of the company's operations.	Copy of Procedure	6 months after first disbursement
PERFORMANCE STANDARD 2 – LABOUR AND WORKING CONDITIONS		
9. Human Resources Policy Task: Compile a 2-3 page Human Resources Policy that covers staff and contractors / sub-contractors in line with IFC's PS2 and which summarizes policy, planning, procedures and implementation.	Human Resources Policy	6 months after first disbursement

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PERFORMANCE STANDARD 3 – POLLUTION PREVENTION AND ABATEMENT		
10.Well Abandonment Plans Task: a) Perform an environmental and social risks analysis of the inactive wells in Cutral-Co, classify the wells as low, medium or high risk and propose a Well Abandonment Plan. b) Implement the Well Abandonment Plan within the time frame agreed with IFC.	a) Provide a document describing the criteria to qualify risks and the proposed Well Abandonment Plan b) Provide updates on the implementation plan as part of the AMR	a) 12 months after first disbursement b) Yearly
11.Environmental Monitoring Plan Task: Implement an Environmental Monitoring Plan for all of the Company's facilities following IFC EHS Guidelines requirements, in form and content acceptable to IFC.	Copy of the Plan	8 months after first disbursement
12.Greenhouse Gas Emissions Task: Provide in form and content acceptable to IFC, a GHG emissions monitoring plan.	Copy of the Plan and annual monitoring reports	8 months after first disbursement
PERFORMANCE STANDARD 5 – LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT		
13.Land Use Compensation Procedure Task: Prepare and implement a Land Use Compensation Procedure (LACP), in form and content acceptable to IFC.	Copy of Procedure	6 months after first disbursement
PERFORMANCE STANDARD 8 – CULTURAL HERITAGE		
14.Chance Find Procedure Task: Prepare and implement a Chance Find Procedure.	Copy of Procedure	3 months after first disbursement