

CANOPUS [30311] - Environnemental and Social Action Plan (ESAP)

	Action	Deliverable(s)	Deadline
PS1: Social and Environmental Assessment and Management Systems			
1.	<u>Management Program</u> Appoint qualified technical expertise to assist the Sponsor in developing a formal environmental management program, including detail procedures, so that it covers key aspects in IFC Performance Standards focusing on the following: - Articulation of Corporate Environmental and Social Policy; - Environmental and social impacts assessment procedure, including technical scope, to be applied to the new projects in the Company's pipeline; - Community engagement and grievances process - Effluent management - Life and Fire Safety - Emergency preparedness and response plans - Land acquisition and involuntary resettlement - Biodiversity conservation - Monitoring and reporting	Terms of Reference for preparation of Policy and management program, including complementary procedures for each of the identified gaps Final procedures, in form and content mutually acceptable Documented evidence of implementation of revised procedures	6 months after first disbursement 12 months after first disbursement Together with Annual Monitoring Report (AMR)
2.	<u>Organizational Capacity</u> Designate or contract a corporate environmental officer responsible for oversight of the preparation and implementation of a the aforementioned Management Program Contract sufficient Occupational Safety Engineers to ensure adequate oversight, including field audits, of all construction projects across the country.	Terms of reference for each area of responsibility (and for vacancy announcement as applicable) Formal assignment of responsibilities or contracting of new position for the management of sustainability aspects at the corporate level (development and implementation of the Management Program) Contracting of additional Occupational Safety Engineer to monitor and audit projects	6 months after first disbursement 12 months after first disbursement 6 months after first disbursement
3.	<u>Monitoring –Audits of Construction Projects</u> Develop and implement a robust Environmental, Health, and Safety (EHS) audit program of construction projects to identify and correct occupational and environmental hazards. The audit program should include documented summary of findings and corrective action plans.	Written procedure (as part of Management Program) Evidence of implementation of procedure	12 months after first disbursement Together with AMR

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4.	<u>Reporting</u> Prepare internal and external reports on key indicators of environmental, occupational health and safety, and social performance. External reports will be disclosed annually in the company's external website.	Definition of contents of future reports in agreement with IFC Publicly disclosed sustainability report	12 months after first disbursement January 2014 and annually thereafter
PS2: Labor and Working Conditions			
5.	<u>Human Resource (HR) Policy</u> Review and amend the Internal Employee Rules Handbook to be consistent with IFC Performance Standard 2 requirements. Publish the HR policy in a handbook or another format for easy distribution to all existing and incoming workers.	Completed and disclosed HR Policies	12 months after first disbursement
6.	<u>Employee Grievance Process</u> Develop and implement employee grievance process consistent with IFC Performance Standard 2 requirements.	Completed and disclosed grievance process (together with HR policy handbook)	12 months after first disbursement
7.	<u>Occupational Health and Safety – Accident Statistics</u> Monitor accidents of subcontractors' employees during construction projects as required by Brazilian Law (this includes accidents occurring while working on site or en route to work. Account for these accidents in the Sponsor's occupational accident statistics, differentiating between the Sponsor's and the subcontractor contribution to these rates. <u>Accident Investigations</u> Amend the accident investigation procedures to include a root-cause analysis and a concrete set of corrective and preventive actions that shall also be communicated to all employees as part of on-going training programs.	Written procedures (as part of Management Program) Evidence of implementation of procedures	12 months after first disbursement Together with AMR
PS3: Pollution Prevention and Abatement			
8.	<u>Effluent Management</u> For large-scale, medium-to-high density peri-urban housing developments of greater than 2,000 persons that are not connected to the municipal waste water treatment system: (i) undertake analysis to identify and quantify potential adverse impacts of septic tank and leach field sanitation solutions; (ii) utilize such systems only if the analysis demonstrates an absence of such adverse impacts; (iii) when septic tank systems are adopted, provide contacts to homeowners of appropriately qualified system maintenance contractors; (iv) in other	Evidence of formal decision procedure (as part of Management Program) Evidence of implementation of procedure in projects where septic systems are currently planned. Evidence of long-term implementation of procedure	12 months after first disbursement Before finalizing design of applicable projects Together with AMR

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	cases, construct developments with sewage collection networks, and construct or cause sewage treatments systems to be provided for the developments.		
PS4: Community Health and Safety			
9.	<u>Life and Fire Safety System Design (Commercial Buildings)</u> For all new commercial buildings, engage professional services of a qualified Life and Fire Safety Engineer mutually acceptable to prepare Master Plan (engineering design) and post construction inspections to verify that the system was installed as designed. Life and fire safety design shall be responsive to mutually agreed life safety codes. <u>Certification of Life and Fire Safety System Design</u> Provide third party certification by a qualified professional mutually acceptable that the design and construction of life and fire safety systems for new constructions comply with mutually agreed standards. <u>Certification of Life and Fire Safety System Construction</u> The designer shall provide a professional certification affirming that facility construction faithfully incorporates all elements of the life and fire safety design previously certified to IFC.	Signed contract for professional services to perform the Life and Fire Safety system design and post construction inspection and certification of as-built system. Certification prepared and submitted to IFC by the qualified professional engaged as described above. Certification prepared and submitted to IFC by the qualified professional as described above.	Prior to start of construction of commercial buildings