

Environmental and Social Action Plan: Triada – Colombia - 31366
February 22, 2012

#	Description	Deliverables	Due Date
Social and Environmental Assessment and Management Systems			
1	Triada will develop a formal Environmental and Social Management System (ESMS) at corporate level that covers policies, objectives and mitigation measures to manage Environmental and Social (E&S) impacts of the projects including, but not limited to land acquisition and involuntary resettlement; solid waste management; effluent management; occupational health and safety; management of contractors; working conditions; community engagement; biodiversity and natural resource conservation, and; cultural heritage. As part of the implementation, Triada will create an Environmental and Social (E&S) coordination function; provide training to employees; and develop management programs, procedures, monitoring and reporting protocols.	Nomination of the Environmental and Social (E&S) coordination function created with defined functions.	September 2012
		Time-bound action plan for the implementation of the management system	December 2012
		Report on implementation Environmental and Social Management Systems (ESMSs)	First Annual Monitoring Report
		Internal or external audit results showing implementation of the ESMS management system	December 2013
2	Triada will formalize an Environmental and Social (E&S) review procedure to identify the potential E&S risks during land acquisition, and methods to manage and mitigate these risks and possible associated impacts. . The review should include: (i) site-specific environmental issues affecting potential development of the site; (ii) potential economic and physical displacement associated with land acquisition; (iii) site-specific biodiversity assessment (if applicable), and (iv) potential discovery of cultural property.	Environmental and Social (E&S) review procedure covering the assessment of the defined topics.	December 2012
		Evidence of implementation of assessment during land acquisition.	First land acquisition after commitment
Labor and Working conditions			
3	Triada will reinforce the training provided to employees on OHS elements for high risk tasks (such as assembling and operating cranes) and on solid waste management at construction sites. Triada will implement processes to properly manage training and qualifications records throughout the company and ensure that only qualified operators have access to the cranes and perform high risk tasks	Description of mechanism in place that verifies training and skills, as well as maintenance of records	December 2012
4	The company will review the current clauses in the construction contracts to incorporate elements such as management of construction debris and any additional conditions derived from the implementation of the ESMS such as reporting in case of finding archeological property.	Copy of contracts with the relevant E&S clauses	December 2012
Pollution Prevention and Abatement			
5	For the projects developed under this transaction Triada will secure confirmation from relevant authorities of the acceptance of effluents as discharged to the sewage systems and will ensure compliance with local requirements for the management of the liquid effluents for each development. Where such confirmation is not obtained, Triada will either incorporate relevant systems into the design of the project or support the development of adequate capacity in the public sector or the lead developer.	Confirmation of the acceptance of effluents as discharged to the sewage systems and compliance with local requirements or the plan to address effluent aspects at each project	Ongoing, as projects are developed
Cultural Heritage			
6	Develop a formal chance finds protocol providing appropriate protection in the event of unexpected discovery of items of cultural heritage, and the contractual right to apply such a protocol if necessary	Copy of the chance finds protocol	December 2012