

Table 4-1 Environmental and Social action Plan (ESAP) Matrix

IFC-PS	GAP	REF CODE	CORRECTIVE ACTION (Mitigation mechanism)	EXECUTION DATE <sup>1</sup>	S&E Consultant Comments	STATUS
PS1	The Concessionaire has an open investigation sanction process (Auto 2406 of 2021) for unauthorized works carried out in sector Macal, UF2.	PS1-1	Presenting update of the status of the investigation sanction process within the biannual report to the IE.	Biannual until investigation sanction process closure	Evidence was provided. No progress has been reported by ANLA.	ACHIEVED
PS1	The Concessionaire has not established a strategy to close the environmental permits from the construction phase and request the corresponding permits for the O&M phase.	PS1-2	Preparing a schedule to close each environmental permit no longer needed (identifying the UFs involved), keep and/or request the ones that are required for the O&M phase, subject to any changes in timeline by corresponding authority.	60 Days Prior to Completion Date	To be presented in a future period	OPEN
PS1	The Concessionaire has an outdated Emergency Preparedness and Response Plan (EPRP) for the O&M phase.	PS1-3	Updating the EPRP for the O&M Phase ensuring detailed description of infrastructure susceptible to mass removal events and the early warning system in place for the management of possible landslides, including the relocation of any members of the local communities that could possibly be affected.	Prior to Completion Date	The Concessionaire has progressed updating the EPRP. Disclosure of the EPRP has been carried out with the involvement of communities as well as regional and local authorities. An emergency drill is pending to be developed with communities.	IN PROGRESS
PS1	The Concessionaire has outdated CMP plans for the O&M phase	PS1-4	For the entire corridor, update the following CMP plans for the operation and maintenance phase of the Project: i) Plan to Manage and Monitor Greenhouse Gases; ii) Local Labor Hiring Plan; iii) Community Health, Safety, and Security Plan; and iv) Worker Grievance Plan	Within three months of the Completion Date.	To be presented in a future period	OPEN
PS2	The Grievance mechanism in place for workers is not ensuring anonymous complaints can be raised and properly addressed.	PS2-1	Update the grievance mechanism to include the methodology and procedure to receive and respond anonymous complaints from workers	30 days after Financial Close	Completed. Evidence was provided. No further action is required.	CLOSED
PS2	The Concessionaire has a H&S Corrective Action Plan opened by the Incumbent LTA to reduce the accident rates in the Project.	PS2-2	Delivering the outstanding information requested by the Incumbent LTA of the H&S CAP to the satisfaction of Infrata.	Prior to Financial Close	Completed. Evidence was provided. No further action is required.	CLOSED
PS2	The Concessionaire has a Labor Corrective Action Plan opened by the Incumbent LTA given the deviations related to the workers' labor conditions (days-off, working regime verification).	PS2-3	Delivering the outstanding information requested by the Incumbent LTA of the Labor CAP-HS to the satisfaction of Infrata.	Prior to Financial Close	Completed. Evidence was provided. No further action is required.	CLOSED
PS3	The Concessionaire still needs to carry out the air and noise monitoring established in the environmental license 2022 of 2018 (UF1.3 to UF3) during the construction	PS3-1	Presenting an estimated schedule of air and noise monitoring for UF1.3 to UF3 until the completion of dismantling phase (Fase de Desmantelamiento in Spanish).	Prior to Completion Date	To be presented in a future period	OPEN

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	dismantling phase once such stage is reached.	PS3-2	Presenting the latest results of the air and noise monitoring for UF1.3 to UF3 during construction and until the completion of the dismantling phase	Biannual until no longer required by the authority	To be presented in the next reporting period, as sampling was reported during May 2022.	OPEN
PS3	The implementation of the GHG reduction plan needs thorough analysis and report for the construction and O&M phases	PS3-3	Reporting the analysis of the results of the GHG reduction strategies the Project has implemented during construction	Prior to Completion Date	To be presented in a future period	OPEN
		PS3-4	Present a report detailing the actions to be implemented by the Concessionaire in order to reduce the Project's GHG production over the next few years.	30 days prior to Completion Date	To be presented in a future period	OPEN
		PS3-5	Reporting the analysis of the results of the GHG reduction strategies the Project has implemented during O&M	Biannual during O&M stage	To be presented in a future period	OPEN
PS3	The Concessionaire does not have a policy for saving water and energy consumption at the organizational level.	PS3-6	Present a policy or program for saving water and energy consumption at the organizational level where measures are established to minimize negative environmental impacts on the use of water resources and energy consumption.	30 days prior to Completion Date	To be presented in a future period	OPEN
PS4	Absence of a plan to identify and evaluate risks and impacts on the health and safety of communities during the O&M Stage.	PS4-1	Developing a consolidated matrix of identification and assessment of impacts and risk to the H&S of the communities for the O&M phase, including the mitigation measures to implement	Prior to Completion Date	To be presented in a future period	OPEN
		PS4-2	Presenting a report with the progress of implementation	Biannual during O&M stage	To be presented in a future period	OPEN
PS4	The Concessionaire still needs to communicate the Emergency Preparedness and Response Plan and management activities of the mutual aid plan for the O&M to local communities.	PS4-3	Carry out the divulgation of the updated EPRP to the stakeholders and evidence of progress of the mutual aid plan for the O&M phase	60 Days after to Completion Date	To be presented in a future period. The Concessionaire has confirmed progress in updating the EPRP. During the period, the Concessionaire held sessions with communities as well regional and local authorities to disclose the EPRP.	IN PROGRESS
PS4	The Concessionaire needs to include thorough detail on the steep slopes and potential landslides within the Emergency Preparedness and Response Plan.	PS4-4	Assess the hillsides of steep slopes that might be unstable. Deliver an assessment report.	Within three months of the Completion Date.	The Concessionaire has informed to the ESC that has preliminary identified steep slopes that might be unstable, but it has not issued the official assessment report.	OPEN
		PS4-5	Monitor the condition of the infrastructure that might be affected by potential landslides.	As part of the Environmental and Social Compliance Report (ESCR) delivered during the O&M phase.	To be presented in a future period.	OPEN

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		PS4-6	Update the early alert system with procedures to handle potential landslides, including the potential relocation of possible affected parties	Within 30 days following the First Disbursement	The Concessionaire is progressing with the ESC comments. Affected parties due to landslides are being followed up by the Concessionaire at NT187 and NT259.	IN PROGRESS
PS5	The Concessionaire has not finished the process of land acquisition for the Project.	PS5-1	Preparing a report with the update of the actual status of the land acquisition.	Prior to Financial Close	Completed. Evidence was provided. No further action is required.	CLOSED
		PS5-2	Presenting within the report the progress of land acquisition	Biannual until completion	Evidence has been provided. See detailed information in Section 3.6 of this report.	ACHIEVED
PS5	The Concessionaire has not finished the socioeconomic compensations and the follow up activities with the Social Units relocated.	PS5-3	Preparing a report with the update of the status of the socioeconomic compensations.	Prior to Financial Close	Completed. Evidence was provided. No further action is required.	CLOSED
		PS5-4	Presenting a report with the progress of socioeconomic compensations and the traceability of social units relocated.	Biannual until completion	Evidence has been provided. See detailed information in Section 3.6 of this report.	ACHIEVED
PS5	The Concessionaire has not planned an external audit to assess the completion of the resettlement process based on the IFC requirements.	PS5-5	Scheduling an audit to assess the resettlement process. <sup>1</sup>	Prior to Completion Date	To be presented in a future period	OPEN
PS5		PS5-6	Carrying out the audit to assess the resettlement process. <sup>2,3</sup>	Up to 240 days following Completion Date <sup>4</sup>	To be presented in a future period	OPEN
PS6	Execution and closure of environmental compensation to the forestry exploitation, approved by CORPONARIÑO (UF1.3 to UF3 and UF5.2) is required.	PS6-1	Presenting a report with the traceability and actual status of the compensation.	Prior to Financial Close	Completed. Evidence was provided. No further action is required.	CLOSED
		PS6-2	Present in the reporting updates of the progress	Biannual until closure of compensation	Progress was partially provided for the period. Monitoring will continue until its closure	IN PROGRESS
PS6	Execution and closure of the environmental compensation for water occupation, approved by CORPONARIÑO (UF5.2) is required.	PS6-3	Presenting a report with the traceability and actual status of the compensation.	Prior to Financial Close	Completed. Evidence was provided. No further action is required.	CLOSED
		PS6-4	Present in the reporting updates of the progress.	Biannual until closure of compensation	Progress was partially provided for the period. Monitoring will continue until its closure	IN PROGRESS
PS6	Execution and closure of the environmental compensation for water concession, approved by CORPONARIÑO (UF1 to UF5)	PS6-5	Presenting a report with the traceability and actual status of the compensation.	Prior to Financial Close	Completed. Evidence was provided. No further action is required.	CLOSED
		PS6-6	Present in the reporting updates of the progress	Biannual until closure of compensation	Progress was partially provided for the period. Monitoring will continue until its closure	IN PROGRESS
PS6	Execution and closure of the environmental compensation for biodiversity loss, approved by ANLA (UF1.3 to UF3.2 and UF4 to UF5.1).	PS6-7	Presenting a report with the traceability and actual status of the compensation.	Prior to Financial Close	Completed. Evidence was provided. No further action is required.	CLOSED
		PS6-8	Present in the reporting updates of the progress	Biannual until closure of compensation	Progress was partially provided for the period. Monitoring will continue until its closure	IN PROGRESS
PS6	Execution and closure of the environmental compensation to the forest lifting of ban approved by ANLA-MADS (UF1.3 to UF3.2 and UF4 to UF5.1) is required.	PS6-9	Presenting a report with the traceability and actual status of the compensation.	Prior to Financial Close	Completed. Evidence was provided. No further action is required.	CLOSED
		PS6-10	Present in the reporting updates of the progress	Biannual until closure of compensation	Progress was partially provided for the period. Monitoring will continue until its closure	IN PROGRESS
PS6	Lack of approval, execution, and closure of environmental compensation by biotic	PS6-11	Presenting a report with the traceability and actual status of the compensation.	Prior to Financial Close	Completed. Evidence was provided. No further action is required.	CLOSED

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	component and forest lifting ban, established by ANLA in resolution 579 of 2020.	PS6-12	Present in the reporting updates of the progress	Biannual until closure of compensation	Partial evidence was provided related to the compensations progress; however, full approval granted by ANLA is still pending.	IN PROGRESS
PS6	The Concessionaire does not have a conservation and monitoring program for the species <i>Centrolene bubillayi</i> , <i>Pristimantis supernatis</i> , <i>Gastrotheca orophylax</i> , <i>Riama simotera</i> and <i>Lycalopex culpaeus</i> , during the O&M stage.	PS6-13	Present a conservation and monitoring program for the species <i>Centrolene bubillayi</i> , <i>Pristimantis supernatis</i> , <i>Gastrotheca orophylax</i> , <i>Riama simotera</i> and <i>Lycalopex culpaeus</i> , during the O&M phase.	30 days prior to Completion Date	To be presented in a future period	OPEN
PS7	The agreements protocolized during the prior consultation process with six indigenous People have yet to be finalized.	PS7-1	Present biannual reports of the progress to close the agreements protocolized.	Biannual until closure of agreements	Evidence has been provided. See detailed information in Section 3.7 of this report.	ACHIEVED
			Provide the closure minutes with the Ministry of Interior and each of the six Indigenous communities of Catambuco, Montaña de Fuego, Tangua, Iles, Aldea de María, and San Juan.		To be presented in a future period	OPEN
PS7	The Concessionaire has not developed a strategy for the interaction with the Indigenous People once the consultation agreements have been closed.	PS7-2	Update the PGSC including a specific program for the indigenous people during the O&M phase.	30 days before Completion Date	To be presented in a future period	OPEN
PS8	The Concessionaire has an open sanction process for unauthorized archaeological works in UF4 and 5, and affectation to archaeology material.	PS8-1	Designing a legal strategy that includes possible scenarios and actions to take, depending on the progress of the process.	Prior to Financial Close	Completed. Evidence was provided. No further action is required.	CLOSED
PS8	The Concessionaire still needs to complete the archaeological activities according to the intervention's authorizations granted by the ICANH.	PS8-2	Preparing the final reports of the archaeological permits still in progress and submission to ICANH.	180 days following Completion Date	To be presented in a future period. The Project's archaeological team has reported progress of final reports as follows: 94% in AIA N°7610 and 30% in AIA N°8030.	IN PROGRESS
PS1 to 8	Outstanding closure of actions of the ESAP from the Mini perm and HSSE actions raised by the Incumbent LTA	PS1-5	Presenting the last E&S construction monitoring prepared by the Incumbent LTA	First E&S monitoring report	Evidence provided; no further action required	CLOSED
			PS1-6	Delivering the outstanding information requested by the Incumbent LTA of to the satisfaction of Infra.	Periodically with the E&S monitoring report until its closure.	Information provided is under the ESC's assessment, new actions have been included to be followed up in the ESC monitoring. This action is considered superseded by the new action to be monitored.
PS1 to 8	Open requirements imposed by the Environmental Authorities (EA) result of the control and monitoring they carry out on the Project	PS1-7	Present the information submitted to address each of the requirements opened by the Environmental Authorities included in the Environmental and Social Claims (Schedule 10) of the Intercreditor Agreement and the Environmental Claims (Annex 4.39[d]) of the COP Loan Agreement	Periodically with the E&S monitoring report until its closure.	A summary of the progress was provided for the ESC review. However, detailed evidence of the information provided by the Concessionaire to each claim has been provided so far, nor evidence of the delivery to the ANLA. Monitoring will continue until its closure.	IN PROGRESS

KEY

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	Closed: No further action is required					
	Achieved: Actions implemented for the reporting period, and monitoring of compliance will continue for further periods.					
	In Progress: Actions implemented to close out the breach, but further evidence is required to verify full compliance					
	Delayed: No progress reported, or evidence/info was not provided to the LSA to verify compliance.					
	Open: Not applicable to the relevant period of report. Actions scheduled at a later date.					

Source: ESC, October 2022