

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	An estimated schedule to request the closure of outstanding construction permits has been provided Their formal closure will depend entirely on the Authorities response.	CLOSED
PS1	The Concessionaire has an outdated Emergency Preparedness and Response Plan (EPRP) for the O&M phase.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 developed the procedure to early warning. If case a risk event occurs, the social team will carry out an assessment to determine affectation to housing and livelihood conditions and thus proceed with mitigation measures.	CLOSED
PS1	The Concessionaire has outdated CMP plans for the O&M phase	PS1-4	For the entire corridor, update the following CMP plans for the operation and maintenance phase of the Project: i) Plan to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.	All documents were provided and comments from the ESC were addressed.	CLOSED
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	An estimated schedule to carry out pending monitoring was presented. Two monitoring campaigns are estimated during 2023.	CLOSED

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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	Completed. Evidence was provided. The latest air and noise monitoring during construction were performed in November-December 2022.	CLOSED
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	Result of the assessment was provided.	CLOSED
		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	Evidence provided. No further actions required.	CLOSED
		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	Evidence has been provided. Its implementations will proceed during O&M stage and any additional update to the program.	CLOSED
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	Completed. Evidence provided. No further actions required.	CLOSED
		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	Completed. An emergency drill was developed with the involvement of local stakeholders on September 13 <sup>th</sup> , 2023. Previous preparation meetings were held with participation of the Concessionaire emergency response team, Disaster Risk Management Departmental Office, Local Fire Brigade, Red Cross, Iles and Contadero mayorships, supervision team and workers, which involved disclosure of the EPRP.	CLOSED
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. Progress of the assessment has been submitted to the ESC. Implementation of the early warning procedure will be followed-up during monitoring.	ACHIEVED

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		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.	Progress on the identification of infrastructure with potential landslides has been reported.	ACHIEVED
		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 has completed to the ESC satisfaction the procedure and has been approved and signed within the CMS.	CLOSED
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 3.5 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 3.5 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	The Concessionaire has confirmed that the External Audit has been scheduled to be performed in April 2024.	CLOSED
		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 provided for the period. CORPONARIÑO has emitted two technical concepts, one confirming the compliance of the compensation measure for shoring authorized in ZODME Z5-13. And the second concept with the compensation measures compliance from CT 5078/2019, Res. 766/2018 and Res. 1175/2016 The Concessionaire has requested a certificate of clearance to CORPONARIÑO for total closure. Monitoring will continue until its closure.	ACHIEVED
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 provided for the period with the 6 <sup>th</sup> and final maintenance report regarding compensations from CT 245/2020 IN Chapalito Recreational Park. Monitoring will continue until its closure.	ACHIEVED

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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 provided for the period. Monitoring will continue until its closure.	ACHIEVED
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 provided for the period. A followed up of the compensation were presented and the maintenance stage has progressed 75%. Monitoring will continue until its closure.	ACHIEVED
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 provided for the period. . A followed up of the compensation were presented and the maintenance stage has progressed 68%. Monitoring will continue until its closure.	ACHIEVED
PS6	Lack of approval, execution, and closure of environmental compensation by biotic component and forest lifting ban, established by ANLA in resolution 579 of 2020.	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
		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. The first followed up report was presented for ecological restoration.	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	Evidence has been provided. Its implementations will proceed during O&M stage.	CLOSED
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.		In November 2022, the Ministry of Interior issued closing minutes for Catambuco, Montaña de Fuego and Tangua indigenous communities. On August 30 <sup>th</sup> , 2023, issued the closing minute for Iles indigenous community. Followed up minutes for Aldea de María community were reported. Monitoring will continue until all indigenous communities have closed the PC with the endorsement of MININTERIOR.	IN PROGRESS

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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	Completed. Evidence was provided. No further action is required.	CLOSED
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	The final report from AIAs 7610 and 8030 were filed. The Concessionaire is awaiting the ICANH's response. Monitoring will continue until ICANH issues the approval closing the licenses.	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 Infirata.	Periodically with the E&S monitoring report until its closure.	Information provided was assessed by the ESC, 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.	CLOSED
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.	Progress was provided for the ESC review. Nevertheless, a detailed report of the progress and comply for each requirement has not been provided in order to keep track of its closure and a progress percentage cannot be determined. Monitoring will continue until its closure.	IN PROGRESS

KEY

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, December 2023

Table 4-2 Compliance monitoring against IFC's Performance Standard

IFC-PS	GAP	REF CODE	CORRECTIVE ACTION (mitigation mechanism)	EXECUTION DATE <sup>1</sup>	S&E Consultant Comments	STATUS
MONITORING – Q1-2022						
PS3	Control of the water taken from the Sapuyes and Guaitara rivers is not ensured; no flowmeter nor records of pumping system use was observed in place during the visit May 2022.	PS3-7	Installation of the flowmeters as approved by ANLA. Provide evidence of the actions taken.	Immediate to be presented as part of the E&S monitoring report for May-Jul 2022	Evidence provided. Implementation confirmed during site visits conducted by the ESC.	CLOSED
		PS3-8	Undertake proper training for the operators with written instructions and formats available onsite, ensuring records of water extracted. Provide evidence of the actions taken.	Immediate to be presented as part of the E&S monitoring report for May-Jul 2022	Evidence provided. Implementation confirmed during site visits conducted by the ESC.	CLOSED
PS3	The pumping systems observed during the visit are not preventing the tank trucks from entering the river while taking the water.	PS3-9	Adapt the pumping systems location to ensure the tank trucks avoid contact with the water. Provide evidence of the actions taken.	Immediate to be presented as part of the E&S monitoring report for May-Jul 2022	Evidence provided. No further action required	CLOSED
PS3	Lack of spill control measures were noted during the site visit to the Mikel camp in May 2022. A secondary containment area assigned to the asphalt plant was noted leaking to the soil the oily water it contained. As well as the sludge from the concrete plant washing area was noted spilled. Additionally, the chemicals storage area defined in the crushing line 3 has no secondary containment.	PS3-10	Undertake clean up in general at the Mikel camp to areas with oil stains and sludges, especially where no concrete slab is in place and contact to soil is direct. Provide evidence of the actions taken	Immediate to be presented as part of the E&S monitoring report for May-Jul 2022	Evidence provided. No further action required	CLOSED
		PS3-11	Build up the secondary containment for the oils' storage area, additionally ensure MSDS and labelling are available at the site. Provide evidence of the actions taken.	Immediate to be presented as part of the E&S monitoring report for May-Jul 2022	Evidence provided. Implementation confirmed during the site visit conducted by the ESC.	CLOSED
PS3	The Project is not avoiding the use of products that fall in WHO Recommended Classification of Pesticides by Hazard Class Ia (extremely hazardous); or Ib (highly hazardous); the pest control activities reported used of a product classified within these categories.	PS3-12	Review the pesticides proposed by the pest control provider and avoid use of category I products. Provide evidence of the actions taken.	As part of the E&S monitoring report	According to the information provided of agrochemical used during the period, none of them are category I, finding products category II (moderately dangerous) and III (slightly dangerous).	ACHIEVED
MONITORING – Q2-2022						
PS1	Different donation areas approved by CORPONARIÑO have presented landslides recurrently in the recent months, involving affectation to houses, productive activities, and watercourses; the management and risk assessment in these areas need to improve.	PS1-8	Define and implement a strategy to assess, monitor and manage the donation areas approved by CORPONARIÑO that are open with the aim to prevent landslides and potential affectation to the environment and communities. Include identification of possible affected parties (environmental and social)	As part of the E&S monitoring report for Aug-Oct 2022	Progress in the management of the donation areas was confirmed, completion of works is still in progress. Damages incurred to housing and crops nearby NT187 and NT259 have been managed through economic compensations as well as social follow up to reestablish affected people's conditions. A follow up of donation	IN PROGRESS

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					areas with contingencies has been carried out. Although, a strategy to assess, monitor and manage them has not been provided.	
		PS1-9	Include in the track record of contingencies shared with the ESC information of the landslides that have historically occurred in ZODMEs that are not yet included (NT178, NT179, NT183, NT187 and NT259)	As part of the E&S monitoring report for Aug-Oct 2022	Progress was provided. The Concessionaire is progressing with the works at these sites. Keep reporting progress until closure of donation areas by the authority. Among the 12 donation areas reported, four have presented contingency events, all of them have been closed.	ACHIEVED
PS2	Lack of evidence addressing issues raised in the labor inspections at work fronts carried out by the HR teams (As per the incumbent LTA)	PS2-4	Provide evidence of the actions taken as result of the internal labor inspection to contractors and subcontractors	As part of the E&S monitoring reports starting on the report for Aug-Oct 2022	Evidence provided.	CLOSED
PS3	Air quality management plan for the O&M phase is still pending	PS3-13	Provide a plan for air quality management during the O&M phase that includes the identification of sources, activities, receptors, measures for management and any need of monitoring	Within 3 months prior to Completion Date	Evidence provided.	CLOSED
PS3	Noise management plan for the O&M phase is still pending (As per the incumbent LTA)	PS3-14	Provide a plan for noise management during the O&M phase that includes the Identification of sources, activities, receptors, measures for management and any need of monitoring	Within 3 months prior to completion date	Evidence provided.	CLOSED
PS3	Outstanding evidence of implementation of the close-out monitoring plan and handover to the landowner of facilities of Stretch 2	PS3-15	Provide progress of implementation of the close-out monitoring plan for facilities of Stretch 2.	As part of the E&S monitoring reports starting on the report for Aug-Oct 2022	During the period progress in the dismantling activities was provided. Closure minutes for Cebadal and Tangua campsites were issued. Keep reporting progress until completion of activities.	ACHIEVED
PS3	Improvement of environmental performance at the Mikel Camp is still required (As per the incumbent LTA and recent site visits).	PS3-16	Provide evidence of actions taken to: Protect steel and scrap metal from rain and store in an area not directly on the ground to avoid rust and potential soil and runoff contamination. Protect also the tires stored. Improve spills prevention in the workshop areas	Immediate to be presented as part of the E&S monitoring report for Aug-Oct 2022	Progress of dismantling was provided. Closure minutes with owners from Boqueron - San Juan and Mikel campsite were presented.	IN PROGRESS
PS3	Installation of the flowmeter at the water treatment plant for the CCO El Porvenir is still pending.	PS3-17	Evidence of installation of the flowmeter at the CCO El Porvenir.	Immediate to be presented as part of the E&S monitoring report for Aug-Oct 2022	Flowmeter was installed.	CLOSED

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PS3	Results of the monitoring carried out in May 2022 wastewater discharged in the wastewater treatment plant (WWTP) at the Mikel camp exceeded the Total Suspended Solid threshold established in the national limits.	PS3-18	Provide evidence of the actions taken to avoid TSS exceedances in the wastewater effluent in the WWTP at the Mikel camp	As part of the E&S monitoring report for Aug-Oct 2022	Evidence was provided, the corrective measures were implemented.	CLOSED
PS5	Concessionaire has not presented yet, the management that is being carrying out with landowners and/or land users affected by expropriation of 53n°.	PS5-7	Carry out an analysis of management implemented with landowners and/or land users located in 53n° plots under expropriation that proves that livelihood and economic conditions is not being affected.	As part of the E&S monitoring report for Feb-April 2023	Number of plots in expropriation has been updated (61n°). Three SU (2 inhabitants and 1 productive) have received the compensation factors in accordance with the Res. 545 of 2008.	CLOSED
PS5	Results of monitoring and evaluations applied to each social unit has not been concluded.	PS5-8	Complete all monitoring and evaluation sessions aimed at affected US and compile the results of its implementation.	March 2023	Progress has been provided; a matrix report has been developed to track all management carried out with SU. About 51 SU are pending for monitoring and evaluation.	ACHIEVED
PS5	The characterization of affected people differentiation their ownership and vulnerability condition has partially presented.	PS5-9	Advance and submit a characterization of all affected people including those with legal rights, informal tenure, irregular occupants, and people identified with vulnerable conditions (i.e., women, children, victims of armed conflict, indigenous people, and extreme poverty, among others).	As part of the E&S monitoring report for Feb-April 2023	Completed. Characterization of affected people has been provided.	CLOSED
PS5	The Concessionaire has an outdated Relocation Action Plan for displaced people and economic activities.	PS5-10	Update the Relocation Action Plan and submit the most recent version approved.	As part of the E&S monitoring report for Feb-April 2023	The final version of the Plan's update has been issued in September 2023.	CLOSED
PS5	Analysis of effectiveness of measures implemented to affected people aimed at ensuring restoration of livelihood and economic conditions has not been provided.	PS5-11	Elaborate and submit an analysis of total restoration of livelihood and economic standards of affected people that shows each measurement taken and its effectiveness.	March 2023	A summary with the ex-post surveys results was presented. The analysis of this information will be expected in the final report of the resettlement plan.	IN PROGRESS
PS5	Replacement of economic activities has not been assessed by the Concessionaire.	PS5-12	Present the follow up carried out and the analysis of each PSU, that depicts reestablishment of productive activities (economic or in specie), income restoration, infrastructure replacement, among others.	As part of the E&S monitoring report for Feb-April 2023	The Concessionaire has provided a matrix with information regarding compensations in species and in cash aimed at economic conditions replacement.	CLOSED
PS6	The Wildlife Conservation Plan (for <i>Hyloxalus cf delatorrae</i> y <i>Gastrotheca argenteovirens</i> ) still need update and periodic reporting of progress during the implementation (As per the incumbent LTA)	PS6-14	Update the wildlife conservation plan according to the course of action to be established with the ESC.	As part of the E&S monitoring report for Aug-Oct 2022	Evidence was provided, the plan was updated.	CLOSED
		PS6-15	Provide reports of progress during the implementation.	As part of the E&S monitoring reports starting	Progress was provided. Monitory in-situ of compensation plan finished, and	ACHIEVED



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				on the report for Aug-Oct 2022	respective report was emitted. Compensation plan was updated and include activities to be implemented annually until 2025. Progress will be reported until its closure.	
MONITORING – Q4-2022						
PS1	The Concessionaire has an open investigation sanction process (Auto 9699 of 2022) for five facts breaching the environmental license of UF4 and 5.1.	PS1-10	Presenting information on the strategy to follow with ANLA and periodic update of the status of the investigation sanction process within the E&S reports to the ESC.	As part of the E&S monitoring until investigation sanction process closure	Progress on the status was provided. The Concessionaire is answering the requirements and collecting reports which will help reduced adverse consequences in the probationary stage. .	IN PROGRESS
PS1	Lack of diligence addressing claim of drainage clogged in Bolivar neighborhood in UF4 and clear communication with the neighbors on the maintenance and responsibilities.	PS1-11	Provide evidence of the maintenance carried out to unclog the drainage at Bolivar neighbourhood.	As part of the E&S monitoring report for Feb-Apr 2023	Evidence provided.	CLOSED
		PS1-12	Socialize with the neighbours of Bolivar in UF4 the responsibilities of the community and of the Concessionaire in the maintenance of the drainage that was clogged. Present the minute of the activity.	As part of the E&S monitoring report for May-July 2023	Evidence provided.	CLOSED
PS3	Zodme ZR2-1 is not preventing sediments to drain off the ZODME with the runoff.	PS3-19	Take prompt action to retain sediments within the ZODME while the final revegetation is carried out	As part of the E&S monitoring report for Feb-Apr 2023	Evidence was provided; corrective measures were taken	CLOSED
PS3	Lack of monitoring in the closure of ZODMEs and donation areas and delivery to the landowners.	PS3-20	Provide a detailed list of ZODMEs and donation areas used in the Project with the schedule to complete its closure and formal delivery to the landowners. Report periodic progress.	As part of the E&S monitoring report for May-July 2023 and successive reporting periods	Detailed list of ZODMEs was provided, presenting a total of 52 ZODMEs, out of which 11 were already closed.	IN PROGRESS
		PS3-21	Provide evidence of the closure of ZODMEs and donation areas with the Landowners and the Environmental Authorities	As part of the E&S monitoring report for May-July 2023 and successive reporting periods	A follow up matrix that includes progress with landowners' closure was provided. Closure with landowners is still in progress, eight out of 41a ZODMES are still open.	IN PROGRESS
MONITORING – Q1-2023						
PS2	Additional actions were identified with REFAM to close out contract and comply with labour obligations towards its workers.	PS2-5	Presenting progress of follow up actions with the subcontractor's compliance of labour obligations.	As part of the E&S monitoring until process closure	Progress on the status was provided. A certificate of clearance upon termination of contract was given by the Concessionaire. Contract settlements were reported.	IN PROGRESS
MONITORING – Q2-2023						

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PS1	Request of the Preventive Measure has not been issued to ANLA	PS1-13	Complete pending works and formally request lifting of the Preventive Measure to ANLA	December 2023	Progress of hydraulic works and revegetation activities in ZODMEs and runoff management have been carried out. A follow up matrix provided by the Concessionaire reflects the progress to date.	IN PROGRESS
PS3	Lack of secondary containment in the chemical's storage area at Capuli Service Area	PS3-22	Adequation of the area where chemicals are stored to ensure secondary containment	To be verified in the next E&S monitoring	The storage area is in design process.	IN PROGRESS
KEY						
	<b>Closed:</b> No further action is required					
	<b>Achieved:</b> Actions implemented for the reporting period, and monitoring of compliance will continue for further periods.					
	<b>In Progress:</b> Actions implemented to close out the breach, but further evidence is required to verify full compliance					
	<b>Delayed:</b> 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, December 2023