

#	Action	Completion Indicator	Deadline (FC + months)
1.	Develop an Environment and Social Management System (ESMS), aligned with VINCI policies and procedures, IFC's Performance Standards (PSs) and the requirements of the Concession Agreement (CA).	<ul style="list-style-type: none"> a. ESMS documentation acceptable to the Lenders. b. Evidence of ESMS established at all airports. 	<ul style="list-style-type: none"> a. See below for individual deadlines. b. 12 months after Financial Close (FC)¹.
1.1.	Establish an overarching Environment and Social (E&S) policy defining the objectives and principles in line with the VINCI E&S policy framework including AIRPACT and consistent with the requirements of the IFC PSs.	<p>E&S Policy acceptable to the Lenders. The policy should include amongst other aspects:</p> <ul style="list-style-type: none"> a. A reference to compliance with national laws and regulations. b. A commitment to explicitly and proactively contribute to the sustainable development of the Cape Verde tourism industry in line with government plans². 	3 months after FC.
1.2.	Develop and implement a procedure to screen for and assess E&S risks and impacts of the works components, based on the type, scale, and location, as well as alternative project designs, so as to guide the scope and level of effort devoted to the risks and impacts assessment needed, in accordance with the E&S Requirements.	<p>Submit acceptable to the Lenders:</p> <ul style="list-style-type: none"> a. An E&S screening and assessment procedure (i.e., E&S screening and assessment methodology defined in the Strategic Environmental Assessment). b. An E&S and biodiversity risks and impacts screening of the works components under Phase 1-A, together with the agreed scope and level of E&S assessment. Depending on the works, this may comprise a limited or focused Environmental and Social Assessment, or straightforward application of environmental siting, pollution standards, design criteria, or construction standards. c. E&S assessment/s. 	<ul style="list-style-type: none"> a. At FC. b. 3 months after FC. c. 90 days before construction works commence.

¹ As defined in the CTA.

² Resolution n1/2019 – Grandes Opcoes do Plano Estrategico de Desenvolvimento Sustentavel do Turismo para 2018-2030; Plano Operacional do Turismo, Resolution n°31/2022 - Programa Operacional do Turismo 2022 a 2026

	The screening procedure will apply to all phases of the investment plan.		
1.3.	EPC Contractor(s) to develop and implement a Construction Environmental Management Plan(s) (CEMP) and associated sub-plans, guided by the risk and impact assessments undertaken and aligned to the IFC PS and relevant WBG Environment, Health and Safety (EHS) Guidelines.	<p>EPC CEMP/s and associated sub-plans approved by the CVA and acceptable to the Lenders. The sub-plans are defined in the EPC Agreement and may include but not be limited to:</p> <ul style="list-style-type: none"> • Biodiversity management plan; • Subcontractors' management plan; • Air emissions and dust management; • Waste management (covering hazardous and non-hazardous waste streams); • Oil and chemical spill management; • Traffic and transport management; • Occupational Health and Safety (OHS) management; • Emergency preparedness and response; • Community health and safety management; • Security management; • Grievance procedure (external for affected parties); • Noise and vibration management; • Chance finds procedure; and • Environmental monitoring program (noise, air emissions, etc.). 	30 days before construction works commence.
1.4.	<p>a. Undertake an assessment of the existing organizational capacity against project E&S commitments (including this ESAP) and identify hiring needs; and</p> <p>b. Based on this analysis upgrade the E&S organizational structure at CVA. At a minimum, this will include the recruitment of a qualified E&S manager.</p>	<p>a. Organizational Capacity assessment submitted to the Lenders.</p> <p>b. New staff recruited and organizational structure updated (as needed). CVs, terms of reference and training plans for all newly recruited E&S staff submitted to the Lenders.</p> <p>c. E&S manager with experience in the application of the IFC PSs, acceptable to the Lenders, appointed.</p>	<p>a. 3 months after FC.</p> <p>b. 9 months after FC.</p> <p>c. 3 months after FC.</p>

1.5.	Review and update the Emergency Preparedness and Response Plans (EPRPs) for all airports to align with the VINCI requirements, provisions of relevant IFC PSs and the relevant WBG EHS Guidelines. This will include a review of local emergency services to assess their capacity and resources.	EPRPs for all airports acceptable to the Lenders. The EPRPs will cover amongst other aspects an E&S emergency communication procedure with local authorities and local communities to ensure coordination in case of both onsite and offsite emergency. The EPRP should make provisions for the school at SID and the kindergarten at VXE.	6 months after FC.
1.6.	Develop an operations E&S monitoring plan to demonstrate compliance with VINCI commitments and the E&S Requirements.	Operations E&S monitoring plan acceptable to the Lenders. The plan will cover amongst other aspects: a. Parameters to be monitored including water and electricity use, greenhouse gas emissions; water and wastewater quality, air and noise emissions; and waste and hazardous waste. b. Clear responsibilities on monitoring activities, proposed monitoring locations, methods and frequency of monitoring, and criteria against which compliance and performance will be assessed. c. Procedures for internal and external audits, to monitor and measure the effectiveness of the ESMS.	9 months after FC.
2.	Develop HR policies and procedures in line with national laws, VINCI policies and procedures, and the E&S Requirements. These HR policies and procedures will be applicable to all workers including those employed by third parties, made readily accessible and clearly communicated at onboarding and through the provision of additional sensitization and training.	a. HR policies and procedures acceptable to the Lenders. The policies will cover at a minimum: 1. Sexual Harassment and Gender Based Violence (GBV). 2. Prevention of Child and Forced Labor. 3. Freedom of Association and Collective Bargaining. 4. Non-discrimination and Equal Opportunity. 5. Labor Grievance Management. The procedures will cover at a minimum: 1. Recruitment. 2. Onboarding. 3. Working Terms and Conditions.	a. 12 months after FC. b. 12 months after FC.

		<ul style="list-style-type: none"> 4. Labor Grievance Mechanism including provisions to receive and manage anonymous grievances and grievances related to sexual harassment and GBV. 5. Performance Management. 6. Disciplinary Management. <p>b. Submit evidence of:</p> <ul style="list-style-type: none"> i. Workers onboarding program – checklist of HR documentation for induction. ii. Evidence of visible display of all key HR documentation at strategic locations. iii. Evidence of sensitization campaign for all existing workers in relation to the new HR documentation. 	
3.	Document the employee transfer process to demonstrate absence of direct or indirect retrenchment in the context of the airport privatization.	Employee transfer documentation acceptable for Lenders.-	3 months after FC
4.	Review and update the OHS Management System, in line with VINCI policies and procedures and the E&S Requirements.	<p>An OHS Management System acceptable to the Lenders. At a minimum it will include:</p> <ul style="list-style-type: none"> a. An OHS Policy. b. A procedure for health and safety risk assessments in relation to activities and tasks. c. A risk register. d. Hazard controls and preventive protocols to manage health and safety risks. e. A work-related injury recording procedure, using an internal monitoring tool (BeSAFE) used by VINCI at corporate level. f. An OHS training program for to all airport workers. 	12 months after FC.
5.	a. Update, as needed, and include VINCI EHS and Labor requirements in contractor/	a. Updated EHS and Labor contractor/ service provider (except EPC Contractor) schedules and contract templates to be submitted to lenders for approval.	<ul style="list-style-type: none"> a. 6 months after FC. b. 1 month before

	<p>service provider contracts with CVA.</p> <p>b. Develop a Contractor Monitoring Procedure to monitor the performance of contractors and their sub-contractors with national laws, project E&S requirements and PS2 provisions.</p>	<p>b. EPC Contractor Monitoring Procedure applicable to the works all contractors and service providers, acceptable to the Lenders. This should define the type and frequency of monitoring and auditing to be undertaken, the E&S parameters to be monitored and audited and reporting requirements.</p> <p>c. General Contractor Monitoring Procedure applicable to all contractors and service providers, acceptable to the Lenders. This should define the type and frequency of monitoring and auditing to be undertaken, the E&S parameters to be monitored and audited and reporting requirements.</p>	<p>construction starts</p> <p>c. 6 months after FC</p>
6.	<p>a. Establish energy and water consumption baselines.</p> <p>b. Develop energy and water use management plans aligned to the VINCI policies and CA commitments.</p> <p>c. Undertake an audit the water storage conditions and quality at all water storage facilities against local regulations and relevant WBG EHS Guidelines.</p> <p>d. Based on the findings of the audit, develop and implement remedy measures to bring these facilities to compliance.</p>	<p>a. Energy and Water consumption baseline established.</p> <p>b. Energy and Water Use Management Plan developed and acceptable to the Lenders. The Water Use Management Plan should account for water scarcity issues.</p> <p>c. Audit of the water storage facilities acceptable to the Lenders.</p> <p>d. Evidence of completed upgrades/ remedy measures at all airports acceptable to the Lenders.</p>	<p>a. 6 months after FC.</p> <p>b. 6 months after FC.</p> <p>c. 12 months after FC.</p> <p>d. 18 months after FC.</p>
7.	<p>Description of the measures put in place to mitigate the physical risks identified as part of the climate change risk assessment for each airport.</p>	<p>Submit to acceptable to the lenders: Measures undertaken to mitigate physical risks.</p>	<p>18 months after FC.</p>

8.	<ul style="list-style-type: none"> a. Undertake noise contour modelling for each airport in line with GIIP. b. In coordination with key stakeholders, develop Noise Management Plans in line with national regulations and the WBG EHS Guidelines for Airports and, using as a guidance framework, the ICAO policy on airport noise management 	<p>Submit acceptable to the Lenders:</p> <ul style="list-style-type: none"> a. Noise contour modelling reports. b. Noise Management Plan. 	<ul style="list-style-type: none"> a. 3 months after FC (Condition Subsequent) b. 6 months after FC (Condition Subsequent)
9.	<ul style="list-style-type: none"> a. Undertake an audit of the structural integrity and functioning of all septic tanks against national standards and relevant WBG Guidelines. b. Based on the findings of the audit, develop and implement upgrade/ remedy measures to bring these systems to compliance. c. Undertake design studies for the Wastewater Treatment Plants (WWTPs). d. Install WWTPs at SID, BVC and VXE and upgrade the WWTP at RAI. For the remaining airports, install new septic tank systems to allow for adequate primary treatment. <p>The WWTPs and septic tanks will be designed and operated in line with</p>	<p>Submit acceptable to the Lenders:</p> <ul style="list-style-type: none"> a. Audit of the septic tank systems. b. Evidence of completed upgrades/ remedy measures at all airports. c. Basic designs of WWTPs and septic tank systems. d. Evidence of WWTP and septic tank systems installed or upgraded as per the design requirements. 	<ul style="list-style-type: none"> a. 6 months after FC. b. 18 months after FC. c. As per the Phase 1B deadlines of the CA but no later than 24 months after FC. d. As per the Phase 1B deadlines of the CA but no later than 48 months after FC.

	national standards and WBG EHS Guidelines for Water and Sanitation.		
10.	Review and upgrade as required, the surface water drainage systems (including oil water separators) at all airports, in line with relevant WBG EHS Guidelines.	Submit acceptable to the Lenders: a. Basic design of the drainage improvements. b. Evidence of completed upgrades/ remedy actions.	a. 6 months after FC. b. As per deadlines of EPC agreement but no later than 24 months after FC.
11.	<ul style="list-style-type: none"> a. Develop a Waste Management Plan in line with IFC PS 3 requirements and relevant WBG EHS Guidelines. b. Undertake an audit of the temporary waste storage facilities against national standards and WBG EHS Guidelines for Waste Management Facilities. c. Based on the findings of the audit, develop and implement upgrade/ remedy measures to bring these facilities to compliance. d. Undertake an options analysis of the waste disposal at the four international airports, prior to making a decision on the waste incinerators. e. Undertake the design of the preferred option in accordance 	Submit acceptable to the Lenders: <ul style="list-style-type: none"> a. Waste Management Plan. The plan will include provisions for waste management hierarchy (prevention, reduction, reuse, recovery, recycling, removal and finally disposal of wastes) so as to limit the amount of waste disposed. b. Audit of all temporary waste storage facilities. c. Evidence of completed upgrades/ remedy actions. d. Waste disposal option report, including a comparison of various options in the context of the resource-scarce island economy and regulatory context. e. Basic Design of the selected waste disposal option. If incinerators are used, the filter technology will be state of the art with a maximum reduction in GHG and other emissions. The capacity of the selected sustainable waste management option will be estimated based on waste generated by passenger and traffic evolution. f. Evidence of waste disposal option implemented as per the design requirements. 	<ul style="list-style-type: none"> a. 3 months after FC. b. 6 months after FC. c. 12 months after FC. d. As per the Phase 1B deadlines of the CA but no later than 20 months after FC. e. As per the Phase 1B deadlines of the CA but no later than 24 months after FC.

	<p>WBG EHS Guidelines for Waste Management Facilities.</p> <p>f. Implement the preferred waste disposal option.</p>		<p>f. As per the Phase 1B deadlines of the CA but no later than 42 months after FC.</p>
12.	<p>Undertake:</p> <p>a. Asbestos Containing Material (ACM) surveys at all the airports in order to assess presence, quantities, conditions and associated risk.</p> <p>b. Inventory of all existing HVAC equipment containing coolant gases (hydrofluorocarbons such as R124 and R22).</p> <p>c. Inventory of all existing equipment containing Polychlorinated Biphenyls.</p> <p>d. Based on the findings, develop a time-bound plan to manage the safe removal or replacement and treatment and/ or disposal of such hazardous waste as per applicable international standards.</p>	<p>Submit acceptable to the Lenders:</p> <p>a. ACM Surveys and HVAC and PCB inventories for all airports.</p> <p>b. A time-bound management plan.</p> <p>c. Evidence of completed upgrades/ remedy actions.</p>	<p>a. 12 months after FC.</p> <p>b. 12 months after FC.</p> <p>c. 18 months after FC.</p>
13.	<p>a. Develop and implement a Hazardous Materials Management Plan (HMMP) and a Spill Response Plan in line with</p>	<p>Submit acceptable to the Lenders:</p> <p>a. HMMP and Spill Response Plan including a Maintenance and Inspection Protocol.</p> <p>b. Structural integrity audits and inspections report.</p> <p>c. Evidence of completed upgrades/ remedy actions.</p>	<p>a. 6 months after FC.</p> <p>b. 12 months after FC</p>

	<p>IFC PS 3 requirements and relevant WBG EHS Guidelines.</p> <p>b. Conduct detailed structural integrity audits and inspections of all hazardous material transport and storage infrastructure against relevant WBG EHS Guidelines.</p> <p>c. Undertake upgrades as required to bring these facilities to compliance.</p>		c. 18 months after FC.
14.	Based on Phase II ESA findings and recommendations, prepare and implement a time-bound site remediation plan in accordance with Cape Verdean legal requirements and relevant WBG EHS Guidelines	<p>Submit acceptable to the Lenders:</p> <p>a. Site remediation plan.</p> <p>b. Documentation of site remediation completion.</p>	<p>a. 6 months after FC.</p> <p>b. 12 months after FC.</p>
15.	<p>a. Engage a specialized consultant to undertake a Life and Fire Safety (L&FS) audit of all the passenger terminals and other priority areas against Cape Verdean regulations, and relevant WBG EHS guidelines.</p> <p>b. Based on the audit findings, develop and implement corrective Life and Fire Safety measures according to an agreed time-bound plan.</p>	<p>Submit acceptable to the Lenders:</p> <p>a. L&FS audit report and time-bound corrective plan.</p> <p>b. Evidence of completed corrective measures.</p>	<p>a. 6 months after FC.</p> <p>b. 9 months after FC.</p>
16.	Assess human trafficking risks associated with the airports and establish suitable prevention	Submit a Human Trafficking Risk Assessment (based on available data, desktop review and interviews with authorities, experts/NGOs as well as any other relevant stakeholders) and Action Plan to lenders for approval.	12 months after FC.

	measures in cooperation with the relevant public authorities and specialized NGOs, including sensitization of travelers and staff.		
17.	Review the government-led land acquisition process and develop supplementary measures, to align with IFC PS 5 requirements.	Review of government-led land acquisition process and supplementary plan to address gaps acceptable to the Lenders.	3 months after FC.
18.	Develop a Land Acquisition Procedure for any future expansion of the concession areas in line with national laws and IFC PS 5 requirements.	Land Acquisition Procedure acceptable to the Lenders.	6 months after FC.
PS 6: Information Biodiversity Conservation and Sustainable Management of Living Natural Resources			
19.	In consultation with the relevant national and international organizations, develop Biodiversity Action Plans (BAP) and Biodiversity Monitoring and Evaluation Plans (BMEP) for BVC and MMO, in line with PS6 requirements and in consistency with the airports' Wildlife Management Plans.	BAP and BMEP acceptable to lenders.	12 months after FC.
20.	In conjunction with the Civil Aviation Authority and municipalities, develop, and/ or update Wildlife Management Plans in line with national regulatory and PS6 requirements.	Wildlife Management Plans for all airports developed/ updated acceptable to the Lenders.	12 months after FC.

	In the development or update of these plans, any actions/ measures that impact on or are in conflict with PS6 requirement will be identified and managed appropriately		
21.	Assess risks of invasive species introductions and establish suitable bio-control measures to reduce such risks, including sensitization of visitors to such risks.	Risk of invasive species assessment and associated invasive species plan acceptable to the Lenders.	12 months after FC.
PS 1: Stakeholder Engagement and Community Grievance Management			
22.	<p>a. Develop and implement a i) Stakeholder Engagement Plan (SEP) and ii) a Community Grievance Mechanism (CGM) in alignment with PS1 requirements.</p> <p>b. Nominate and train a staff member to serve as a Community Liaison Officer (CLO).</p>	<p>a. Submit to lenders for approval:</p> <ul style="list-style-type: none"> i. A SEP containing amongst other aspects, specific stakeholder engagement information for each airport and any engagement activities undertaken as part of E&S assessment. ii. A CGM which will allow for submission and management of community grievances (including anonymous grievances). iii. Evidence of implementation at each airport (minutes of meetings, CGM flow chart with key information placed at key public places, maintenance of a grievance register, etc.). <p>b. A staff member nominated and trained as a CLO at each airport.</p>	<p>a. i – 3 months after FC. ii – 6 months after FC. iii – 12 months after FC.</p> <p>b. 9 months after FC.</p>