

**ANNEX 1: Environmental and Social Action Plan - Raxio Data Centers, Master Contract**

No.	Item	Timeline
<b>Performance Standard 1: Environmental and Social Assessment and Management System</b>		
1	Develop a Corporate Environmental and Social Management System (ESMS) in line with the requirements of the Performance Standards (PS) and applicable to the design, construction and operations phases of all Subprojects. The ESMS will notably include (i) a standard Emergency Preparedness and Response Procedure (EPRP), (ii) a stakeholder engagement framework, (iii) an external grievance mechanism, (iv) a procedure to review Construction Environmental and Social Management Plans, and (v) procedures to adjust existing policies and carry out the necessary actions to manage any potential Project E&S risks and impacts in compliance with the PSs	Within 6 months from the Contract of Guarantee Effective Date
2	Define a standard Environmental and Social Impact Assessment (ESIA) scope of work and E&S site selection criteria consistent with PS 1 requirements, to be used for any Subproject development.	Within 3 months from the Contract of Guarantee Effective Date
3	Disclose on the Raxio Group website the ESIA reports summary prepared for development of the Subprojects	Within one month from approval of each Subproject ESIA
4	Develop a framework Environmental and Social Management Plan (ESMP) for operations, applicable to all employees, contractors, subcontractors, and service providers conducting activities at any Subproject site	Within 6 months from the Contract of Guarantee Effective Date
5	Hire a Corporate Environmental and Social (E&S) Manager	Within 3 months from the Contract of Guarantee Effective Date
6	Assign an E&S Coordinator at all Subproject sites	Prior to the start of operations of each Subproject – For UG1, within 3 months from the Contract of Guarantee Effective Date
7	Develop standard Terms of Reference (ToR) to conduct a climate risk and vulnerability assessment for the Subprojects. For Subprojects at high risk to climate change impacts, define appropriate risk mitigation measures	Within 6 months from the Contract of Guarantee Effective Date
<b>Performance Standard 2: Labor and Working Conditions</b>		
8	Revise the Corporate workplace grievance mechanism to allow any Project employees to raise anonymous complaints, including potential complaints related to gender-based violence and harassment	Within 3 months from the Contract of Guarantee Effective Date
9	Develop a Corporate Occupational Health and Safety (OHS) Management Plan applicable to the operations of all facilities	Within 6 months from the Contract of Guarantee Effective Date
10	Develop contractor management and oversight procedures at Corporate level covering, as a minimum, compliance with local labor laws, PS2 requirements related to child and forced labor, terms of OHS management, and access to a workers' grievance mechanism	Within 6 months from the Contract of Guarantee Effective Date
11	Revise the Corporate Procurement Policy to ensure that suppliers and service providers are screened against the risks of forced and child labor	Within 4 months from the Contract of Guarantee Effective Date
<b>Performance Standard 3: Resource Efficiency and Pollution Prevention</b>		
12	As part of the framework Operations-ESMP applicable to all Raxio sites, develop waste, wastewater and hazardous materials management guidelines in line with PS3 and the applicable WBG EHS Guidelines	Within 6 months from the Contract of Guarantee Effective Date
<b>Performance Standard 4: Community Health, Safety and Security</b>		

<b>13</b>	Develop a Corporate security policy and management protocol in line with PS4 requirements, addressing the vetting process for the selection of security providers and training requirements for security staff.	Within 6 months from the Contract of Guarantee Effective Date
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