

**Unibán - COLOMBIA**  
**Environmental and Social Action Plan - ESAP**

No.	Aspect	Action Item	Deliverable	Date of compliance
<b>PS1: Assessment and Management of E&amp;S Risks and Impacts</b>				
1.1	Environmental and Social Management System	1. Consolidate an Environmental and Social Management System (ESMS) in line with PS1, integrating all the environmental and social policies, management plans, monitoring programs, procedures applicable to Unibán's industrial, commercial and agricultural operations.	1. ESMS Manual	1. 6 months after financial closure
1.2	Policy	1. Develop a Corporate Sustainability Policy in which environmental, social, occupational health and safety, and biodiversity principles and objectives are defined, and in which it is defined the ones responsible for guaranteeing their compliance within the organization and for executing them. 2. Disseminate the Sustainability Policy throughout the organization.	1. Sustainability Policy 2. Evidence of policy's disclosure to the organization	1. 12 months after financial closure 2. 3 months after the approval of Unibán's Sustainability Policy
1.3	Identification of Risks and Impacts	1. Annually consultations in the Record System for Abandoned Lands and Necessarily Deprived People (SRPADF) of the Management Special Administrative Unit for the Restitution of Land, the status reported for the Company's farming establishments. 2. Incorporate the social risks and impacts in the risk and impact identification matrix and analyzing them according to the methodology suggested. 3. Incorporate in the risk and impact identification matrix those related to biodiversity and analyzing them according to the methodology suggested.	1. Evidence of having consulted the SRPADF on the status of the three plots for the Project site 2. Risk and Impact Identification Matrix updated with social aspects 3. Risk and Impact Identification Matrix updated with biodiversity aspects	1. 6 months after financial closure and then annually while the contract is in force 2. 6 months after financial closure 3. 12 months after financial closure
1.4	Management Programs	1. Develop Unibán's social management plans and/or programs (including industrial, commercial and agricultural activity) in line with its Sustainability Policy which respond to the identified risks and impacts. 2. Incorporate the social management plans and/or programs to the ESMS.	1. Social management plans and/or programs 2. ESMS Manual	1. 6 months after financial closure 2. 6 months after financial closure
1.5	Organizational Capacity and Competency	1. Define governance of Unibán's sustainability strategy	1. Roles and profiles update including responsibilities on the implementation and follow up of the sustainability strategy	1. 6 months after financial closure
1.6	Emergency preparedness and response	1. Prepare a drill plan for the commercial, industrial, and agricultural operations of Unibán that incorporates events in which the community participates when it is a relevant actor.	1. Drill plan	1. December 2022
1.7	Monitoring and Evaluation	1. Incorporate as part of the internal and external audit procedure the scope of Unibán's ESMS.	1. Updated internal and external audit procedure	1. 6 months after financial closure
1.8	Stakeholder Engagement	1. Develop a stakeholder engagement plan appropriate for the risks and impacts of Unibán's operations, and customized to the characteristics and interests of the affected communities, allowing the efficient participation of those groups and people identified as disadvantaged or vulnerable. 2. Integrate the Engagement Plan to the ESMS.	1. Community Engagement Plan 2. ESMS Manual	1. 6 months after financial closure 2. 6 months after financial closure

No.	Aspect	Action Item	Deliverable	Date of compliance
1.9	External Communications and Grievance Mechanisms	<ol style="list-style-type: none"> <li>1. Prepare a Community Communication and Consulting Plan encouraging the adequate participation of the affected communities in the issues that might affect them and ensure the relevant environmental and social information is disclosed.</li> <li>2. Integrate the Communication and Consulting Plan to the ESMS.</li> <li>3. Supplement the RGCS addressing Procedure incorporating elements that allow access to the mechanism to vulnerable groups of the community and that explains how to address the social harassment and gender-based violence cases that could be reported by the communities or external stakeholders.</li> <li>4. Update the RGCS addressing Procedure taking into account instructions for anonymous RGCS, ensuring these will be equally addressed within the scope defined in the Procedure.</li> <li>5. Disclose the claim and grievance mechanism to all the communities in the area of influence of Unibán's operations (commercial, industrial and agricultural).</li> </ol>	<ol style="list-style-type: none"> <li>1. Communication and Consulting Plan</li> <li>2. ESMS Manual</li> <li>3. Updated RGCS Procedure</li> <li>4. Updated RGCS Procedure</li> <li>5. Evidence of dissemination (meeting minutes, list of participants, photos, etc.)</li> </ol>	<ol style="list-style-type: none"> <li>1. 6 months after financial closure</li> <li>2. 6 months after financial closure</li> <li>3. 6 months after financial closure</li> <li>4. 6 months after financial closure</li> <li>5. 6 months after financial closure</li> </ol>
<b>PS2: Labor and Working Conditions</b>				
2.1	Working Conditions and Terms of Employment	<ol style="list-style-type: none"> <li>1. Develop a hydration protocol for workers engaged in port and farming establishment jobs.</li> <li>2. Include among the OHS discussion points on the importance of hydration.</li> </ol>	<ol style="list-style-type: none"> <li>1. Hydration Protocol</li> <li>2. OHS Training Program</li> </ol>	<ol style="list-style-type: none"> <li>1. July 2022</li> <li>2. July 2022</li> </ol>
2.2	Non-discrimination and Equal Opportunity	<ol style="list-style-type: none"> <li>1. Assess Unibán's performance in terms of gender equality on an annual basis. This should include an assessment of the possible areas to be improved considering the characteristics of the Project and its location.</li> </ol>	<ol style="list-style-type: none"> <li>1. Gender equality analysis reports including possible areas for improvement/opportunities</li> </ol>	<ol style="list-style-type: none"> <li>1. 12 months after the financial close and later periodically as part of the ESCR</li> </ol>
2.3	Grievance Mechanism	<ol style="list-style-type: none"> <li>1. Develop a grievance mechanism for workers to be able to submit claims and grievances anonymously and that highlights the commitment with confidentiality and no retaliation. It should describe how sexual harassment and gender violence cases will be addressed.</li> <li>2. Implement physical boxes for grievances in strategic work zones (i.e., canteens, changing rooms, entrance to premises, etc.) containing formats which make it easy for workers from the farming establishments, the industrial zone or port jobs to use.</li> <li>3. Disclose the claim procedure for (own and third-party) workers.</li> </ol>	<ol style="list-style-type: none"> <li>1. Grievance Procedure for workers</li> <li>2. Evidence of box installation</li> <li>3. Evidence of disclosure</li> </ol>	<ol style="list-style-type: none"> <li>1. 6 months after financial closure</li> <li>2. 6 months after financial closure</li> <li>3. 6 months after financial closure</li> </ol>
2.4	Workers Engaged by Third Parties	<ol style="list-style-type: none"> <li>1. Incorporate as a contractual provision that workers from Calima include an Epidemiological Surveillance Program for exposure to and poisoning with chemical products, including an annual cholinesterase blood test for the personnel participating in air sprays.</li> </ol>	<ol style="list-style-type: none"> <li>1. Epidemiological Surveillance Program for Calima</li> </ol>	<ol style="list-style-type: none"> <li>1. 6 months after financial closure</li> </ol>
2.5	Supply Chain	<ol style="list-style-type: none"> <li>1. Prepare a Supply Chain Policy considering, in addition to the compliance with the local legislation and alignment with Unibán's ESMS, considerations on child labor according to the IFC's good practice guide (<a href="#">enlace</a>).</li> <li>2. Disseminate the Supply Chain Policy among all the goods and services suppliers of Unibán.</li> <li>3. Develop a supervising procedure of the commercial, logistics and agricultural providers and contractors of Unibán, including the Supply Chain Policy pillars.</li> <li>4. Incorporate Unibán's supplier and contractor supervision procedure to the ESMS.</li> </ol>	<ol style="list-style-type: none"> <li>1. Supply Chain Policy</li> <li>2. Evidence of dissemination to the supply chain</li> <li>3. Supplier and contractor supervision procedure</li> <li>4. ESMS Manual</li> </ol>	<ol style="list-style-type: none"> <li>1. 12 months after financial closure</li> <li>2. 12 months after financial closure</li> <li>3. 12 months after financial closure</li> <li>4. 12 months after financial closure</li> </ol>

No.	Aspect	Action Item	Deliverable	Date of compliance
<b>PS3: Resource Efficiency and Pollution Prevention</b>				
3.1	Resource Efficiency	<ol style="list-style-type: none"> <li>1. Prepare a Plan consolidating resiliency measures to reduce impingement on climate change and the associated natural hazards (river floods, droughts, landslides, earthquakes, precipitation pattern changes, heat waves) and improve the capacity to adapt to climate variability and/or to climate change as appropriate based on the asset.</li> <li>2. Prepare an Emission Reduction Plan adopting measures for water and energy efficiency, sustainable use of fertilizers in the supply chain and/or providing electrification of means of transport. Taking as reference the resources prepared by the World Banana Forum (<a href="#">link</a>).</li> <li>3. Consolidate Unibán's greenhouse gases (GHG) measurements considering the corporate, industrial and farming establishment activities.</li> <li>4. Integrate resiliency and emission mitigation plans to Unibán's ESMS.</li> </ol>	<ol style="list-style-type: none"> <li>1. Resiliency plan for climate change</li> <li>2. Emission reduction plan</li> <li>3. Carbon footprint</li> <li>4. ESMS Manual</li> </ol>	<ol style="list-style-type: none"> <li>1. 9 months after financial closure</li> <li>2. 12 months after financial closure</li> <li>3. 12 months after financial closure</li> <li>4. 6 months after financial closure</li> </ol>
3.2	Pesticide Use and Management	<ol style="list-style-type: none"> <li>1. Generate an Agrochemical Use and Management Procedure including preventive measures, response in case of incidents, lab exams and medical follow up for personnel.</li> <li>2. Integrate the Agrochemical Use and Management Procedure to Unibán's OHSMS.</li> <li>3. Prepare a Plan to Promote the Use of Biologic Controllers/Products to manage plant security in banana crops which shows a gradual replacement of pesticides.</li> </ol>	<ol style="list-style-type: none"> <li>1. Agrochemical Use and Management Procedure</li> <li>2. Updated Occupational Health and Security Management System</li> <li>3. Plan to Promote the Use of Biological Products</li> </ol>	<ol style="list-style-type: none"> <li>1. 3 months after financial closure</li> <li>2. 3 months after financial closure</li> <li>3. 9 months after financial closure</li> </ol>
<b>PS4: Community Health and Safety</b>				
4.1	Emergency Preparedness and Response	<ol style="list-style-type: none"> <li>1. Supplement the Emergency Prevention, Preparedness and Response Plan consistently with the requirements of the IFC's PS4, as indicated in paragraph 12.</li> <li>2. Disseminate the Emergency Prevention, Preparedness and Response Plan among the external stakeholders involved (communities and authorities related to the Assistance Plan).</li> <li>3. Prepare a Notice and Communication Procedure with external stakeholders on the pesticide spraying processes at Unibán's fields, including a training plan, that can receive concerns and generate an open dialogue on the scope of these activities.</li> <li>4. Incorporate the Procedure to Unibán's ESMS.</li> </ol>	<ol style="list-style-type: none"> <li>1. Emergency Prevention, Preparedness and Response Plan</li> <li>2. Evidence of communication with external stakeholders</li> <li>3. Notification and communication procedure on pesticide spraying processes addressed to communities</li> <li>4. ESMS Manual</li> </ol>	<ol style="list-style-type: none"> <li>1. 6 months after financial closure</li> <li>2. 6 months after financial closure</li> <li>3. 6 months after financial closure</li> <li>4. 6 months after financial closure</li> </ol>
4.2	Security Personnel	<ol style="list-style-type: none"> <li>1. Draft a procedure to manage security forces according to the IFC's PS4 requirements, as stated in paragraph 13.</li> <li>2. Include the Procedure in Unibán's ESMS.</li> <li>3. Request the security company to train guards on the appropriate use of force.</li> </ol>	<ol style="list-style-type: none"> <li>1. Security forces management procedure</li> <li>2. ESMS Manual</li> <li>3. Training minutes, attendance lists, assessments.</li> </ol>	<ol style="list-style-type: none"> <li>1. 6 months after financial closure</li> <li>2. 6 months after financial closure</li> <li>3. 6 months after financial closure</li> </ol>
<b>PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>				
6.1	Protection and Conservation of Biodiversity	<ol style="list-style-type: none"> <li>1. Document and systematize biodiversity actions executed at Unibán's operations, contributing secondary information to plans and procedures in force in line with PS6.</li> <li>2. Perform a critical habitat assessment and the related Biodiversity Action Plan for Unibán's operations in line with PS6.</li> <li>3. Update Unibán's ESMS incorporating biodiversity components in line with PS6.</li> </ol>	<ol style="list-style-type: none"> <li>1. Procedures and Plans associated to updated biodiversity topics</li> <li>2. Critical habitat assessment and Biodiversity Action Plan</li> <li>3. ESMS Manual</li> </ol>	<ol style="list-style-type: none"> <li>1. December 2022</li> <li>2. December 2023</li> <li>3. December 2023</li> </ol>