

PROMEDON – ARGENTINA, BRAZIL, CHILE, MEXICO
Environmental and Social Action Plan (ESAP)

No.	Aspect	Action	Deliverable	Delivery date
PS1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Integrated Environmental and Social Management System.	1. Develop the Terms of Reference to hire a consultancy to: (i) develop an Integrated Environmental and Social Management System, applicable in Argentina, Brazil, Chile and Mexico; and (ii) train strategic employees.	1. Terms of Reference	1. 2 months after financial closure
		2. Hire consultancy.	2. Consulting services contract	2. 2 months after the first disbursement
		3. Develop an Integrated Environmental and Social Management System (IESMS).	3. Manual of the Integrated Environmental and Social Management System	3. 8 months after the first disbursement
		4. Implement the Integrated Environmental and Social Management System.	4. Evidence of implementation of the Integrated Environmental and Social Management System.	4. 1 year after the first disbursement and later as part of the Environmental and Social Compliance Report (ESCR)
1.2	Identification of risks and impacts	1. Develop a Risk and Impact Identification Matrix that specifies and analyzes the environmental and social risks derived from operational processes, including the factory, offices, storage and distribution in Argentina, Brazil, Chile and Mexico.	1. Risk and Impact Identification Matrix	1. 4 months after the first disbursement
		2. Update the Risk and Impact Identification Matrix	2. Updated the Risk and Impact Identification Matrix	2. As part of the ESCR
1.3	Organizational capacity and competency	1. Appoint an employee to lead the IESMS at corporate level.	1. Evidence of appointment a corporate leader	1. 3 months after the first disbursement
		2. Appoint an employee in each country to implement and report on the IESMS to corporate leaders.	2. Evidence of appointment in Brazil, Chile and Mexico	2. 4 months after the first disbursement
1.4	Gender risk	1. Adjust the conditions of the lactation room in Cordoba, making sure it is properly furnished.	1. Evidence of adjustment works.	1. 3 months after the first disbursement
1.5	Emergency preparedness and response	1. Prepare a Corporate Emergency Plan to include the specific requirements of the Emergency Plan for each site and, at least, the following: (i) procedures to identify possible local emergencies as applicable (for instance, fires, earthquakes, floods, etc.); (ii) diagrams with evacuation routes and meeting points; (iii) requirements to protect from emergencies in the structure (for example, fire extinguishers, signs); (v) appointment of roles and leaders, and composition of the emergency response team; (vi) training and drill requirements; and (vii) strategic contact information (for example, fire fighters; near hospitals; etc.).	1. Corporate Emergency Plan	1. 3 months after the first disbursement
		2. Emergency Plan for each site (HQ and factory; warehouses and offices) in Argentina.	2. Emergency Plans in Argentina	2. 6 months after the first disbursement
		3. Emergency Plan for each site (warehouses and offices) in Brazil.	3. Emergency Plans in Brazil.	3. 6 months after the first disbursement
		4. Emergency Plan for each site (warehouses and offices) in Chile.	4. Emergency Plans in Chile	4. 6 months after the first disbursement

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		5. Emergency Plan for each site (warehouses and offices) in Mexico.	5. Emergency Plans in Mexico.	5. 6 months after the first disbursement
1.6	Monitoring and review	1. Develop a Corporate Monitoring Plan for the IESMS.	1. Corporate Monitoring Plan for the IESMS	1. 8 months after the first disbursement
		2. Implement a Corporate Monitoring Plan for the IESMS.	2. Evidence of implementation	2. 1 year after the first disbursement and later as part of the ESCR
PS2: Labor and working conditions				
2.1	Human Resources Policies and Procedures	1. Prepare a local Human Resources Policy for each country, which consolidates the main work-related information, including shifts; annual leave; benefits; overtime policy; onboarding and integration processes; layoff process; and retirement.	1. Human Resources Policies in Argentina, Brazil, Chile, and Mexico	1. 4 months after the first disbursement
		2. Disclose the local Human Resources Policy among the employees.	2. Evidence of disclosure	2. 6 months after the first disbursement
2.2	Grievance Mechanism	1. Disseminate the Communication Channel of the Code of Ethics, the Line PromEthics, to employees and third parties, from Argentina, Brazil, Chile and Mexico, to through different platforms, including, among others, the exhibition of posters in Promedon's physical spaces.	1. Evidence of disclosure	1. 3 months after the first disbursement
2.3	Occupational health and safety	1. Prepare a Corporate Occupational Health and Safety Program for Promedon operations in Argentina, Brazil, Chile and Mexico, including: (i) Promedon's commitment to its employees' and third parties' health and safety; (ii) minimal requirements of the Occupational Health and Safety Program of each country, which must comprise at least: work risks identification and classification, risk prevention measures, personal protection equipment, responsibilities, training, notification of accidents, tracking and KPIs.	1. Corporate occupational health and safety program	1. 7 months after the first disbursement
		2. Implement the Occupational Health and Safety Program for Argentina.	2. Evidence of implementation.	2. 10 months after the first disbursement
		3. Implement the Occupational Health and Safety Program for Brazil.	3. Evidence of implementation	3. 10 months after the first disbursement
		4. Implement the Occupational Health and Safety Program for Chile.	4. Evidence of implementation	4. 10 months after the first disbursement
		5. Implement the Occupational Health and Safety Program for Mexico.	5. Evidence of implementation	5. 10 months after the first disbursement
		6. Adequate storage of cleaning products in the kitchen area from the headquarters in Córdoba, ensuring adequate space specifically designated for this use.	6. Photographic evidence	6. 4 months after the first disbursement
2.4	Workers engaged by third parties	1. Prepare a Corporate Procedure to Manage Workers Engaged by Third Parties, which sets forth the minimum compliance requirements for third parties in terms of work legislation and health and safety conditions.	1. Corporate Procedure to Manage Workers Engaged by Third Parties	1. 4 months after the first disbursement
		2. Implement the Corporate Procedure to Manage Workers Engaged by Third Parties.	2. Evidence of implementation	2. 7 months after the first disbursement
PS3: Resource efficiency and pollution prevention				
3.1	Resource efficiency	1. Develop a Corporate Environmental Management Program, to include:(i) monitoring energy and water consumption, (ii) implementing energy efficiency measures, (iii) scheduling activities to raise awareness about responsible energy and water consumption.	1. Corporate Environmental Management Program	1. 5 months after the first disbursement
		2. Implement the Corporate Environmental Management Program.	2. Evidence of implementation	2. 7 months after the first

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				disbursement
		3. Implement the Corporate Environmental Management Program in Brazil.	3. Evidence of implementation	3. 7 months after the first disbursement
		4. Implement the Corporate Environmental Management Program in Chile.	4. Evidence of implementation	4. 7 months after the first disbursement
		5. Implement the Corporate Environmental Management Program in Mexico.	5. Evidence of implementation	5. 7 months after the first disbursement
3.2	Wastes	1. Prepare an Integrated Waste Management Plan, which includes requirements and procedures to identify and classify, separate, weigh, store and dispose of waste, including ordinary, recyclable and non-recyclable and hazardous waste.	1. Integrated Waste Management Plan	1. 3 months after the first disbursement
		2. Implement the Integrated Waste Management Plan in Argentina.	2. Evidence of implementation	2. 5 months after the first disbursement
		3. Implement the Integrated Waste Management Plan in Brazil.	3. Evidence of implementation	3. 5 months after the first disbursement
		4. Implement the Integrated Waste Management Plan in Chile.	4. Evidence of implementation	4. 5 months after the first disbursement
		5. Implement the Integrated Waste Management Plan in Mexico.	5. Evidence of implementation	5. 5 months after the first disbursement