

**Compañía de Empaques, S.A. - COLOMBIA**  
**Environmental and Social Action Plan (ESAP)**

No.	Aspect	Action	Deliverable	Delivery date
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>				
1.1	Policy	<ol style="list-style-type: none"> <li>Update the Integrated Environmental, Health and Safety (EHS) Policy to address community commitments.</li> <li>Communicate the new ESHS Policy to employees, contractors, and key suppliers.</li> </ol>	<ol style="list-style-type: none"> <li>Updated Comprehensive EHS Policy.</li> <li>Evidence of implementation.</li> </ol>	<ol style="list-style-type: none"> <li>Prior to First Disbursement.</li> <li>As part of the Environmental and Social Compliance Report (ESCR).</li> </ol>
1.2	Gender Risks	<ol style="list-style-type: none"> <li>Develop and implement a written policy to address its commitments to prevent sexual harassment and gender-based violence.</li> </ol>	<ol style="list-style-type: none"> <li>Gender Policy</li> <li>Evidence of implementation.</li> </ol>	<ol style="list-style-type: none"> <li>60 days after the First Disbursement..</li> <li>As part of the ESCR.</li> </ol>
1.3	Management Programs	<ol style="list-style-type: none"> <li>Develop and implement procedures to identify and manage EHS risks in the supply chain.</li> </ol>	<ol style="list-style-type: none"> <li>Procedures to identify and manage EHS risks in the supply chain.</li> <li>Evidence of implementation.</li> </ol>	<ol style="list-style-type: none"> <li>Prior to First Disbursement.</li> <li>As part of the ESCR.</li> </ol>
1.4	Emergency Preparedness and Response (EPRP)	<ol style="list-style-type: none"> <li>Update the EPRP to incorporate measures for evacuating people with special needs and reduced mobility.</li> <li>Visibly demarcate evacuation routes and meeting points for both day and night shifts.</li> </ol>	<ol style="list-style-type: none"> <li>Updated EPRP.</li> <li>Evidence of demarcation</li> </ol>	<ol style="list-style-type: none"> <li>60 days after the First Disbursement.</li> <li>Prior to First Disbursement.</li> </ol>
1.5	Monitoring and Review	<ol style="list-style-type: none"> <li>Update the Company's annual ESMS management review procedure to include key performance indicators (KPIs) for the following topics: i) OHS (analysis of lost time incident rates and frequencies, days without accidents, etc.); ii) environment (calculation of greenhouse gases, water use and energy efficiency, emissions, etc.); and iii) social (number of environmental and social complaints from communities).</li> </ol>	<ol style="list-style-type: none"> <li>Updated annual ESMS review reports by management</li> </ol>	<ol style="list-style-type: none"> <li>As part of the ESCR.</li> </ol>
1.6	Stakeholder Engagement	<ol style="list-style-type: none"> <li>Develop and implement a Stakeholder Engagement Plan that: (i) identifies the types of stakeholders that may be interested in or affected by the Company's operations; (ii) outlines the channels of communication with these parties; (iii) details how environmental and social performance will be regularly reported to stakeholders and the general public; and (iv) indicates who, within the Company, will be responsible for liaising with the communities</li> </ol>	<ol style="list-style-type: none"> <li>Stakeholder Engagement Plan.</li> <li>Evidence of implementation.</li> </ol>	<ol style="list-style-type: none"> <li>60 days after the First Disbursement.</li> </ol>
1.7	External Communication and Grievance Mechanisms	<ol style="list-style-type: none"> <li>Develop and implement a procedure for receiving and processing communications from external stakeholders, as well as to document and address any complaints from the communities in the area of influence.</li> </ol>	<ol style="list-style-type: none"> <li>External Communication Procedure and Grievance Mechanism.</li> </ol>	<ol style="list-style-type: none"> <li>60 days after the First Disbursement.</li> </ol>
<b>PS 2: Labor and Working Conditions</b>				
2.1	Human Resources Policies	<ol style="list-style-type: none"> <li>Develop and implement a Human Resources policy.</li> </ol>	<ol style="list-style-type: none"> <li>Human Resources Policy.</li> <li>Evidence of implementation.</li> </ol>	<ol style="list-style-type: none"> <li>Prior to First Disbursement.</li> <li>As part of the ESCR.</li> </ol>
2.2	Grievance Mechanism	<ol style="list-style-type: none"> <li>Develop and implement an internal Grievance Mechanism that can be used by both direct workers and contractors and that provides procedures to be followed to safely and confidentially report acts of gender-based violence.</li> </ol>	<ol style="list-style-type: none"> <li>Procedure for the Internal Grievance Mechanism.</li> </ol>	<ol style="list-style-type: none"> <li>Prior to First Disbursement.</li> </ol>

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2.3	Occupational Health and Safety	<ol style="list-style-type: none"> <li>Update the OHS Management System Manual to adopt KPI indicators to monitor i) the efficiency of the OHS management system (e.g., % of accidents documented in the Accident Report within 2 days, % of Corrective Actions closed on time); and ii) the gradual reduction of the incidence and severity of accidents.</li> <li>Update the Procedure for Notification and Investigation of Workplace Accidents and Incidents to: i) include the recording of accidents and incidents of both direct and indirect employees; and ii) segregate data by gender in order to obtain useful information on how women are affected at work compared to men.</li> </ol>	<ol style="list-style-type: none"> <li>Evidence of its implementation</li> <li>Updated OHS Management System Manual.</li> <li>Updated ESMS procedure.</li> <li>Evidence of having implemented the OHS Management System Manual and the updated Accident Reporting and Investigation Procedure.</li> </ol>	<ol style="list-style-type: none"> <li>As part of the ESCR.</li> <li>60 days after the First Disbursement.</li> <li>As part of the ESCR.</li> </ol>
2.4	Supply Chain	<ol style="list-style-type: none"> <li>Update and implement the Supply Chain Policy to address child and forced labor and worker safety issues throughout the supply chain.</li> <li>Develop and implement a procedure to identify risks and impacts in the fique supply chain related to labor issues (child labor and forced labor and significant occupational health and safety risks).</li> <li>Develop a Supplier Database to classify fique suppliers based on: i) Environmental and Social (E&amp;S) risk; and ii) the level of compliance with the Performance Standards, national legislation, and the certainty of the Company's information regarding traceability and compliance.</li> <li>Develop and implement a procedure to audit supplier E&amp;S compliance.</li> </ol>	<ol style="list-style-type: none"> <li>Updated Supply Chain Policy.</li> <li>Procedure to identify risks and impacts in the supply chain.</li> <li>Supplier Database.</li> <li>Supply Chain Audit Procedure.</li> <li>Evidence of implementation.</li> </ol>	<ol style="list-style-type: none"> <li>Prior to First Disbursement.</li> <li>60 days after the First Disbursement.</li> <li>90 days after the First Disbursement.</li> <li>90 days after the First Disbursement.</li> <li>As part of the ESCR.</li> </ol>
<b>PS 3: Resource Efficiency and Pollution Prevention</b>				
3.1	Greenhouse Gases and Emissions	<ol style="list-style-type: none"> <li>Submit an analysis of alternatives to reduce VOC emissions to World Bank (WB) General Environmental, Health, and Safety (EHS) Guidelines levels.</li> </ol>	<ol style="list-style-type: none"> <li>Analysis of alternatives to reduce VOC.</li> </ol>	<ol style="list-style-type: none"> <li>90 days after the First Disbursement.</li> </ol>
3.2	Pollution Prevention	<ol style="list-style-type: none"> <li>Submit an analysis of alternatives for the adoption of cleaner production procedures.</li> </ol>	<ol style="list-style-type: none"> <li>Analysis of alternatives for the adoption of cleaner production procedures.</li> </ol>	<ol style="list-style-type: none"> <li>90 days after the First Disbursement.</li> </ol>
3.3	Wastes	<ol style="list-style-type: none"> <li>Signpost the waste collection center and install pallets to isolate the bags from the floor and containment dikes to prevent spills.</li> </ol>	<ol style="list-style-type: none"> <li>Evidence of having implemented the measures.</li> </ol>	<ol style="list-style-type: none"> <li>Prior to First Disbursement.</li> </ol>
3.4	Pesticide Use and Management	<ol style="list-style-type: none"> <li>Eliminate the use of 1a / 1b compounds for rodent control, for a less toxic rodent control approach.</li> </ol>	<ol style="list-style-type: none"> <li>Evidence of implementation.</li> </ol>	<ol style="list-style-type: none"> <li>90 days after the First Disbursement.</li> </ol>
<b>PS 4: Community Health, Safety, and Security</b>				
4.1	Security Personnel	<ol style="list-style-type: none"> <li>Develop an ESMS procedure for assessing and managing physical security risks that documents the requirement to hire female security personnel on all shifts to ensure that any body searches on women are performed by another woman.</li> <li>Implement the physical security procedure.</li> <li>Update the contract with the security services provider to: i) incorporate the company's requirements based on the physical security procedure; and ii)</li> </ol>	<ol style="list-style-type: none"> <li>Physical security risk assessment and management procedure.</li> <li>Evidence of implementation.</li> </ol>	<ol style="list-style-type: none"> <li>90 days after the First Disbursement.</li> <li>Annual report to IDB Invest.</li> </ol>

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		<p>incorporate the guidelines set out in the IFC Good Practice Handbook on the Use of Security Forces: Assessing and Managing Risks and Impacts to reflect the requirements of PS-4.</p> <p>4. Ensure that security personnel receive the necessary ongoing training on security guidelines.</p>	<p>3. Updated contract with the security services provider.</p> <p>4. Evidence of having trained the security personnel.</p>	<p>3. 90 days after the First Disbursement.</p> <p>4. Annual report to IDB Invest.</p>