

<b>Environmental and Social Action Plan – Demerara Bakery 2019</b>		
<b>Action</b>	<b>Compliance indicator</b>	<b>Due date</b>
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>		
Develop an Environmental and Social Management System (ESMS) in compliance with the requirements of PS1.	Implement the Environmental and Social Management System	9 months after disbursement.
Designate an E&S officer responsible to oversee the implementation of measures and actions required under the ESMS	key position, with the necessary skills and tools.	3 months after disbursement.
Design, implement and communicate the policy internally and externally to all stakeholders using effective communication procedures.	Present the new policy Submit evidence of the communication of the policy to different parties.	3 months after disbursement. 6 months after disbursement.
Complement the process of identifying environmental and social risks and impacts. Include construction phase. Consider those beyond OHS, those related to labor and working conditions, those that may affect communities through DBI's operations, those involving contractors, subcontractors, third parties, and primary suppliers. Include all levels of the company and external actors.	Updated procedure for identifying impacts and risks, including communities, contractors, subcontractors, third parties, and primary suppliers.	6 months after disbursement.
Develop management programs for: Supply chain, life and fire safety, emergency preparedness and response, waste, security forces, transportation, traffic safety, stakeholder engagement and all those needed to manage the E&S impacts and risks identified	Implemented management programs, policies, plans or procedures	6 months after disbursement.
Develop a Stakeholder Engagement Plan that fulfills the requirements of the IFC's guide, "Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets ".  The plan will include differentiated measures to enable the effective participation of communities and neighbors and a method for sharing E&S information with communities.	Stakeholder Engagement Plan.  Methodology for sharing E&S information with communities and documenting it.	6 months after disbursement.
Develop, implement and maintain an emergency preparedness and response system in collaboration with third parties to respond to accidental and emergency situations to prevent and mitigate any harm to people or the	Implemented emergency preparedness and response system	6 months after disbursement.

environment. Include periodic drills and appropriate signage in each location.  Create an emergency response team, provide basic emergency training to all employees and conduct yearly emergency drills	Evidence on training programs and drills provided	
Establish procedures to monitor and measure the effectiveness of the management programs and compliance with requirements. When possible involve third parties and the community.	Present procedures	1 year after disbursement.
Update the External Grievance Mechanism (EGM) in accordance with PS1.	Updated and disseminated EGM. Share it in social media	9 months after disbursement.
Deliver Annual Environmental and Social Compliance Report with details on implementation of ESAP and ESMS	Present to BID Invest the Annual Environmental and Social Compliance Report	Annually.
<b>PS 2: Labor and Working Conditions</b>		
Update the HR policy and the Internal Grievance Mechanism (IGM) in compliance with the requirements of PS2	Updated and disseminated HR policy and IGM	6 months after disbursement.
Enforce the use of personal protective equipment (PPE) and provide periodic training for PPE's correct use specific to each job	Evidence of training for use of PPE to staff	3 months after disbursement.
Track and record incidents, accidents, injuries and related lost days/hours, and absenteeism. Calculate and report The Lost Time Injury Frequency Rate (LTIFR) and the Lost Time Injury Severity Rate (LTISR).	Evidence on tracking of indicators provided	Annually.
Measure and report annually on workplace conditions such as air and physical parameters resulting from industrial processes. (particulate matter - Maximum Threshold Limit for particulate Inert or Nuisance Dust is 10 mg/m <sup>3</sup> , temperature - Maximum Threshold Limit is 25C)  Develop a program for hydration of workers working at heat exposure.	Records of measurement of particulate matter in areas of flour storage and handling, temperature exposure for each production and packing job.  Present hydration program	Annually.
Develop a Fire Prevention and Fighting System for each location. The system shall be prepared by a duly qualified professional, demonstrating that the buildings comply with safety and fire prevention requirements. The systems shall be designed and installed using established	Fire Prevention and Fighting System for each location	For new locations before construction and for existing location 1 year after disbursement.

standards or a performance-based design, following good technical practices.  Conduct two annual drills, include Inspection and certification of fire detection and suppression electrical and mechanical systems.	Report of inspection and certification	
Develop procedures for the identification and monitoring of risks such as child and forced labor, trafficking of persons, and high-risk safety issues within Supply Chain	Evidence of document on procedures and monitoring mechanisms for supply chain	9 months after disbursement.
Update the company's Occupational Health and Safety Manual including provisions on security of drivers	Updated OHS Manual	6 months after disbursement.
<b>PS 3: Resource Efficiency and Pollution Prevention</b>		
Develop a Waste Management Plan including Hazardous Materials applicable to all locations.	Waste Management Plan with details on waste types, separation and storage, and disposal provided. Provide waste segregation measures, records of solid waste (Kg, ton) by main categories of solid waste at each location, as well as receipts of final disposal from government authorized waste management and recycling contractors.	9 months after disbursement.  Annually.
Implement a procedure for Emissions Inventory of Greenhouse Gases	GHG estimate	Annually.
Define targets and continue measurements of environmental indicators (such as energy, fuel and water consumption), and if necessary, develop efficiency measures.	Analysis of energy, fuel and water consumption provided	Annually.
Acquisition of new equipment for refrigeration has to take into consideration the exclusion of ozone-depleting refrigerants subject to international phase-out or those with high Global Warming Potential (GWP) as per the list detailed in the Montreal Protocol.	New equipment cannot use ozone depleting substances or those with high GWP	Anytime a new acquisition occurs.
Third party in charge of pest management must eliminate pesticides Ia/Ib to be used in DBI, if no possible, DBI will provide evidence to report that	Modified contract and training evidence	6 months after disbursement.

<p>it has modified any service contracts to require third parties and suppliers to provide education and training to employees and to use adequate PPE based upon MSDS and/or ICSCs for the pesticides used. DBI will provide documentary evidence of training of employees and provide integrated pest management procedures as part of the ESMS procedures.</p>		
<p><b>PS4: Community Health, Safety and Security</b></p>		
<p>Implement Transportation / Traffic safety programs as part of the ESMS for drivers and traffic in accordance with the principles described in the general guidelines on Environment, Health and Safety (EHS) (Section 3.4 Traffic safety).</p>	<p>Safety Program for drivers and traffic.</p>	<p>9 months after disbursement.</p>
<p>Develop and implement a Security Forces Management Procedure in accordance with the requirements of IFC's PS4, as outlined in paragraphs 12-14, and will provide a means for neighbors or others to file complaints about the Company, the security personnel, and the security measures implemented. A response system will be implemented for incidents involving law enforcement to ensure that all incidents are recorded and addressed using the correct disciplinary measures when necessary.</p>	<p>Security Forces Management procedure approved by DBI management.</p>	<p>6 months after disbursement.</p>