

CONAPROLE PROJECT
Environmental and Social Action Plan (ESAP)

No.	Aspect	Action	Output	Completion Date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Environmental and Social Management System	1. Strengthen corporate-level management of health and safety in order to standardize working conditions, equipment, training, and instruction for in-house and contracted personnel in all Conaprole activities and to promote the formulation of policies and approval of programs, plans, and procedures of the integrated system in the area of occupational health and safety.	1. Programmed actions for strengthening the management of health and safety at the corporate level	1. 4 months after the first disbursement
1.2	Monitoring and evaluation	2. Prepare and implement an Annual Monitoring Plan on combustion gases, comparing the values obtained with the current legal emission limits and the requirements of the IFC (General Environmental, Health, and Safety Guidelines, IFC, April 2007).	2. Annual Monitoring Plan 3. Submission of measurement results	2. 8 months after the first disbursement 3. Idem
1.3	External communications and grievance mechanism	3. Prepare and implement a documented mechanism to handle complaints and claims from members of the community adjacent to the industrial plants or anywhere else. Through that document, responsibilities will be assigned for handling the complaints or claims and deadlines will be established for providing a response. The documented mechanism will be incorporated as a controlled document in the Integrated Environmental, Social, and Health and Safety Management System	1. Documented mechanism for handling complaints and claims from members of the community	1. 2 months after the first disbursement
PS 2: Labor and Working Conditions				
2.1	Complaints and claims handling mechanism for workers	1. Prepare and implement a documented mechanism to handle complaints and claims from the company's own, temporary, or contract workers (including anonymous reports) whereby responsibilities will be assigned for handling the complaints or claims and deadlines established for providing a response. The documented mechanism will be incorporated as controlled documentation in the Integrated Environmental, Social, and Health and Safety Management System	1. Documented complaints and claims handling mechanism for workers	1. 2 months after the first disbursement
2.2	Workplace health management	1. Designate one full-time general medical doctor to care for permanent and temporary staff at the Montevideo Industrial Plant (CIM). The frequency of medical care at the plant will be determined based on medical criteria and in coordination with the medical doctor who heads up health management for Conaprole's personnel.	1. Respective labor contracts 2. Medical supervision strategy	1. 7 months after the first disbursement

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2.3	Management of workplace safety	<ol style="list-style-type: none"> Implement recommendations on water extinguishing and fire alarm systems at all plants as recommended by the study contracted to ensure full compliance with the country's regulations and alignment with the IFC and World Bank standards (Plant 7, 10, 21, Higuieritas Depots, Joanicó, and Central Workshop; ii) Plant 9; iii) Plant 14; iv) Plant 16; v) Plant 8. Submit the following information according to date agreed with the IFC¹ for each plant: <ol style="list-style-type: none"> Present the start-up and receipt of fire prevention services, submitting evidence of operation of the detection and extinguishing systems; Submit inspection, testing, and maintenance records for fire prevention systems 	<ol style="list-style-type: none"> Plants 7,10,21 Higuieritas Depots, Joanicó and Central Workshop Plant 9 Plant 14 Plant 16 Plant 8 (Excluding SP3) 	<ol style="list-style-type: none"> August 2019 December 2019 January 2020 July 2020 June 2021
2.4		<ol style="list-style-type: none"> Implement a corrective action plan prepared by the Herco firm, at the following plants: CIM, Florida, San Ramón, and Villa Rodríguez 	<ol style="list-style-type: none"> Implement highest priority actions Implement the remaining recommendations 	<ol style="list-style-type: none"> July 2019/Dec 2019 To be defined
2.5		<ol style="list-style-type: none"> Implement the corrective plan indicated by the Herco firm, at the following industrial plants: Plant # 16 Mercedes, Plant # 11 Rincón del Pino, Plant # 10 San Carlos, and Plant # 14 Rivera; 	<ol style="list-style-type: none"> Implement highest priority actions Implement the remaining recommendations from the action plan Conduct an audit at Plant 16, Plant 11, Plant 10, and Plant 14 (Auditor to be appointed) 	<ol style="list-style-type: none"> July 2019 / Dec 2019 To be defined To be defined after 3 and 4 are executed
2.6	Supply chain	<ol style="list-style-type: none"> Agree with TRALE on the following actions: i) Conaprole will install GPS devices on tanks so that their speed will be transmitted to Conaprole; ii) TRALE will prepare and submit to Conaprole an investigation report on any accident and/or incident involving a truck in the fleet transporting a Conaprole tank (full or empty), according to the form and deadline determined by Conaprole; iii) TRALE is required to prepare and submit to Conaprole a half-yearly program of awareness courses for its drivers on road safety, incorporating the preventive actions derived from the accident investigations; course attendance lists will be provided; iv) Conaprole may do random checks for alcohol or drug use on TRALE personnel when they are at the Conaprole plants. Conaprole will determine the penalties that may be imposed for non-compliance. Similar agreements will be gradually reached between Conaprole and other companies transporting raw materials or finished products 	<ol style="list-style-type: none"> Copy of the Agreement with TRALE 	<ol style="list-style-type: none"> 5 months after the first disbursement
PS 3: Resource Efficiency and Pollution Prevention				

¹ This requirement is formulated following the schedule of commitments assumed by Conaprole vis-à-vis the International Finance Corporation (IFC).

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3.1	Pollution prevention	1. Introduce the necessary improvements at the treatment plants that require them, so that effluent quality complies with Uruguayan regulations and the target values indicated by the IFC, according to the schedule indicated to the right	1. CIF 2. CIVR 3. CISR 4. Plant 11 (Rincón del Pino) 5. Plant 16 (Mercedes) 6. Plant 10 (San Carlos)	1. December 2019 2. June 2019 3. October 2019 4. July 2021 5. July 2022 6. July 2021
3.2	Use and handling of pesticides	1. Will not acquire pesticide products containing components in the 1a and 1b hazard category according to the WHO	1. List of pesticides in use	1. 2 months after the first disbursement and periodically
3.3	Community health and safety	1. Do predictive modeling on ammonia dispersion at its industrial plants in San Ramón, Mercedes, and Rivera, which are adjacent or near to homes or roads, to identify preventive actions through their respective contingency plans 2. Implementation of corrective actions	1. San Ramón Plant 2. Mercedes Plant 3. Rivera Plant 4. Implementation of corrective actions	1. 8 months after the first disbursement 2. Idem 3. Idem 4. To be defined