

5. Environmental and Social Action Plan - ESAP

Fernandes Group Enterprises 2020		
Action	Compliance indicator	Due date
Update the Construction Permit for the expansion of the plant in case there are major changes to the initial construction plan for which the current Construction Permit was obtained	Construction permit updated for FGE	When needed
Maintain updated the Certificate of Sanitary Fitness	Up to date Certificate of Sanitary Fitness	As needed
PS 1: Assessment and Management of Environmental and Social Risks and Impacts		
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	An individual will be hired with a 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 FGE'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	Stakeholder Engagement Plan.	6 months after disbursement.

<p>Handbook for Companies Doing Business in Emerging Markets ".</p> <p>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.</p>	<p>Methodology for sharing E&S information with communities and documenting it.</p>	
<p>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 environment. Include periodic drills and appropriate signage in each location.</p> <p>Create an emergency response team, provide basic emergency training to all employees and conduct yearly emergency drills</p>	<p>Implemented emergency preparedness and response system</p> <p>Evidence on training programs and drills provided</p>	<p>6 months after disbursement.</p>
<p>Establish procedures to monitor and measure the effectiveness of the management programs and compliance with requirements. When possible involve third parties and the community.</p>	<p>Present procedures</p>	<p>1 year after disbursement.</p>
<p>Update the External Grievance Mechanism (EGM) in accordance with PS1.</p>	<p>Updated and disseminated EGM. Share it in social media</p>	<p>9 months after disbursement.</p>
<p>Deliver Annual Environmental and Social Compliance Report with details on implementation of ESAP and ESMS.</p>	<p>Present to IDB Invest the Annual Environmental and Social Compliance Report</p>	<p>Annually.</p>
<p>PS 2: Labor and Working Conditions</p>		
<p>Formally approve the updated HR policy and the Internal Grievance Mechanism (IGM) in compliance with the requirements of PS2.</p>	<p>Updated and disseminated HR policy and IGM</p>	<p>6 months after disbursement.</p>
<p>Enforce the use of personal protective equipment (PPE) and provide periodic training for PPE's correct use specific to each job.</p>	<p>Evidence of training for use of PPE to staff</p>	<p>3 months after disbursement.</p>
<p>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).</p>	<p>Evidence on tracking of indicators provided</p>	<p>Annually.</p>

<p>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/m³, temperature - Maximum Threshold Limit is 25C)</p> <p>Develop a program for hydration of workers working at heat exposure.</p>	<p>Records of measurement of particulate matter in areas of flour storage and handling, temperature exposure for each production and packing job.</p> <p>Present hydration program</p>	<p>Annually.</p>
<p>Develop a Fire Prevention and Fighting System for the 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 standards or a performance-based design, following good technical practices.</p> <p>Conduct two annual drills, include Inspection and certification of fire detection and suppression electrical and mechanical systems.</p>	<p>Fire Prevention and Fighting System for the location</p> <p>Report of inspection and certification</p>	<p>For expansion before construction and for existing location 1 year after disbursement.</p>
<p>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.</p>	<p>Evidence of document on procedures and monitoring mechanisms for supply chain</p>	<p>9 months after disbursement.</p>
<p>Update the company's Occupational Health and Safety Manual including provisions on security of drivers, life and fire safety plan, emergency response plan, and first responder organizations.</p>	<p>Updated OHS Manual</p>	<p>6 months after disbursement.</p>
<p>PS 3: Resource Efficiency and Pollution Prevention</p>		
<p>Develop a Waste Management Plan including Hazardous Materials applicable to the location.</p>	<p>Waste Management Plan with details on waste types, separation and storage, and disposal provided.</p> <p>Provide waste segregation measures, records of solid waste (Kg, ton) by main categories of solid waste at the location, as well as receipts of final disposal from government authorized waste management and recycling contractors.</p>	<p>9 months after disbursement.</p> <p>Annually.</p>

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 must 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 would not use pesticides Ia/Ib in FGE's activities, if not possible, FGE will provide evidence to report that it has modified any service contracts to require that third parties and suppliers provide education and training to employees to use adequate PPE based upon Material Safety Data Sheets (MSDS) and/or International Chemical Safety Cards (ICSC) for the pesticides used	Modified contract and training evidence	6 months after disbursement.
PS4: Community Health, Safety and Security		
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).	Safety Program for drivers and traffic.	9 months after disbursement.
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.	Security Forces Management procedure approved by FGE management.	6 months after disbursement.
Conduct a health and safety assessment to get an indication of the health and safety risks that can affect the community. The following aspect will be part of the assessment: i) routine and	Health and safety assessment	1 year after first disbursement

non-routine activities; ii) exposure of community to disease; iii) exposure to accidents; iv) emergency preparedness and response; and v) Impact on eco system.		
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