

**Group HZ - Improving Sustainable Packaging Capacity in Argentina
Environmental and Social Action Plan (ESAP)**

No.	Aspect	Action	Product	Delivery Date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Environmental and Social Management System	1. Prepare and keep updated an Integrated Matrix of Environmental, Social, and Occupational Health and Safety Risks and Impacts, specific to the Project, which includes among other relevant information, direct, indirect, cumulative and climate impacts for construction and operation phases.	1. Updated social, environmental, and health and safety risk matrix	1. Within 3 months after the first disbursement and then as part of the Environmental and Social Compliance Report (ESCR)
		2. Develop an Integrated Environmental, Social, and Occupational Health and Safety Management System (ESMS) Manual specific to the Project, which, among other aspects, consolidates policies and procedures, defines roles for its implementation and monitoring and continuous improvement procedures.	2. ESMS Manual.	2. Within 6 months after the first disbursement.
		3. Implement the ESMS.	3. Evidence of implementation.	3. As part of the ESCR.
		4. Prepare and keep updated a matrix that lists all permits and licenses applicable to the new plant, and contains information such as their issuance and expiration dates, and the status of obtaining them.	4. Permits and licenses matrix.	4. Within 6 months after the first disbursement and then as part of the ESCR.
1.2	Organizational Capacity and Competency	1. Prepare and implement a continuous training program for direct and outsourced employees.	1. Continuous training plan implemented.	1. Within 6 months after the first disbursement and then as part of the ESCR.
1.3	Gender Programs	1. Prepare and implement a program to strengthen the recruitment and participation of women that includes: (i) female hiring targets; (ii) recruitment and technical training processes; and (iii) initiatives to promote retention and professional growth of women.	1. Program to strengthen the recruitment and participation of women implemented.	1. Within 12 months after the first disbursement and then as part of the ESCR.
1.4	Emergency Preparedness and Response	1. Develop and implement an Emergency Preparedness and Response and Risk Management Plan.	1. Emergency Preparedness and Response and Risk Management Plan implemented.	1. Within 6 months after the first disbursement and then as part of the ESCR
1.5	Stakeholder Engagement Plan (SEP)	1. Prepare and implement a stakeholder engagement plan (SEP) specific to the Project, which includes communities, the industrial district and authorities.	1. SEP.	1. 6 months after the first disbursement and then as part of the ESCR
1.6	Grievance Mechanism	1. Establish an accessible grievance mechanism for external communities, containing protocols for the registration of grievances, their traceability and deadlines for their resolution.	1. Grievance procedure for communities.	1. Within 6 months after the first disbursement.
		2. Implement the grievance mechanism for communities.	2. Evidence of implementation.	2. As part of the ESCR.
PS 2: Labor and Working Conditions				
2.1	Occupational Health and Safety	1. Prepare and adopt procedures for the management of occupational risks and medical control of occupational health, which includes (but is not limited to) the risks associated with construction and operation activities of the Project.	1. Risk management and occupational health control procedures adopted.	1. Within 6 months after the first disbursement and then as part of the ESCR.
		2. Evaluate the performance of the ESMS that considers indicators for own and contracted personnel, and generates statistics on: i) lost time accidents; ii) number of days lost; iii) frequency of lost time accidents; iv) severity of lost time accidents; v) fatalities; vi) traffic accidents; and vii) serious accidents that involved loss of work capacity and deaths, causes and measures to be taken to correct them.	2. ESMS performance report.	2. As part of ESCR.
2.2	Third-Party Contracted Workers	1. Include provisions in the contracts of contracted and subcontracted companies that require them to comply with the environmental, social, and health and safety requirements applicable to the Project.	1. Copy of the sections of the standard contracts for contractors and subcontractors.	1. Before hiring contractors and subcontractors.

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2.3	Supply Chain	1. Prepare and adopt a supply chain supervision program, which, among other aspects, includes: (i) the identification of critical suppliers; (ii) labor and health and safety criteria in contracting processes; (iii) the requirement of compliance with current labor legislation; (iv) the express prohibition of child and forced labor; (v) monitoring and audit protocols; and (v) the need to adopt corrective actions for deviations found in audit processes.	1. Supply chain supervision program adopted	1. Within 6 months after the first disbursement and then as part of the ESCR.
2.4	Grievance Mechanism	1. Prepare and keep updated a grievance matrix for own and contracted workers that contains, among other aspects: i) a detail of the dissemination and training events on the use of the mechanism; ii) the dates of grievance capture; iii) the response or resolution deadlines for each grievance; and iv) the follow-up records of activities derived from the grievance resolution process.	1. Updated worker grievance matrix.	1. As part of the ESCR.
		2. Incorporate into the grievance mechanism a procedure for the management of gender-based violence risks.	2. Procedure for the management of gender-based violence risks incorporated into the grievance mechanism.	2. Within 6 months after the first disbursement and then as part of the ESCR.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Greenhouse gases	1. Using a recognized standard, prepare greenhouse gas (GHG) inventories that identify the main emission sources and contain an internal procedure for data collection.	1. GHG emissions inventory.	1. Within two months after the end of each calendar year.
		2. Conduct a technical review that identifies and evaluates lower carbon intensity alternatives.	2. Technical review report.	2. As part of the ESCR.
3.2	Pollution prevention	1. Prepare and implement a solid waste and liquid effluent management program.	1. Solid waste and liquid effluent management program implemented.	1. Within 6 months after the first disbursement and then as part of the ESCR.
		2. Prepare and implement an atmospheric emissions monitoring program.	2. Atmospheric emissions monitoring program implemented.	2. Within 6 months after the first disbursement and then as part of the ESCR.
		3. Prepare and implement a hazardous materials management program.	3. Hazardous materials management program implemented.	3. Within 6 months after the first disbursement and then as part of the ESCR.
PS 4: Community Health and Safety				
4.1	Infrastructure and equipment design and safety	1. Prepare and implement a road safety plan.	1. Road safety plan implemented.	1. Within 6 months after the first disbursement and then as part of the ESCR.
4.2	Security personnel	1. Prepare and adopt a set of conduct standards for security personnel.	1. Conduct standards for security personnel adopted	1. Within 6 months after the first disbursement and then as part of the ESCR.
		2. Prepare and implement a training program for security personnel.	2. Training program for security personnel implemented.	2. Within 9 months after the first disbursement and then as part of the AECR.
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
6.1	Supply Chain	1. Prepare and implement a procedure for traceability of raw materials used by the Project that includes: i) origin requirements; ii) certification controls under internationally recognized schemes (FSC and PEFC); and iii) protocols for environmental due diligence of critical suppliers.	1. Procedure for traceability of raw materials implemented.	1. Within 6 months after the first disbursement and then as part of the ESCR.