

6. Environmental and Social Action Plan

Item Number	Task	Description	Anticipated Completion Date
1.1	Development of ESMS	Genomma will contract an external consultant to develop a robust corporate ESMS framework, including overarching Environmental and Social Policy and procedures, in line with IFC PSs principles and requirements, and will ensure that the new plant and existing distribution center are aligned with this framework. The ESMS will include among others: i) a process to evaluate third party manufacturers, ii) standard operating procedures (SOP) that incorporate quality, environment and OHS procedures (see ESAP #1.3), iii) monitoring and reporting of air emissions, iv) treatment, monitoring, and reporting of liquid effluents, and v) emergency preparedness and response (see ESAP #1.4). Standards will be aligned to local regulation, IFC Performance Standards, and the WBG's EHS Guidelines (both General and Pharmaceutical).	June, 2018
1.2	Preparation of Environmental and Social Assessment	Genomma will prepare a Manifiesto de Impacto Ambiental (MIA, or Environmental Assessment), for construction and operation of the proposed plant. The MIA will identify all related environmental and social impacts and will define an appropriate Environmental and Social Management Plan for their mitigation. For construction, in addition to standard management plans, attention will be given to the development of i) a traffic management plan; ii) Occupational, Health and Safety Management of the contractor workforce; and iii) a Community Engagement Plan.	a) For Construction – Prior to Board Approval b) For Operation – Prior to operations
1.3	Stakeholder Mapping	Undertake a stakeholder mapping to adequately identify community interests as well as other potential concerns / opportunities from other stakeholders	Prior to construction
1.4	Development of Standard Operating Procedures	Genomma will develop and implement SOPs for plant operation to manage risks and impacts identified. The SOPs will incorporate OHS and environmental work instructions and cover issues such as effluents, emissions, solid waste, accident investigation and control of individual OHS risks (physical, chemical and biological).	Prior to operations
1.5	Emergency Response Procedures	i) Genomma will develop emergency response procedures pertaining to plant operation. ii) Training on these procedures and related fire and safety drills will be performed periodically.	Prior to operations

1.6	EHS Monitoring Program	Genomma will develop and implement an EHS monitoring program covering all its facilities which will specify parameters to be monitored, frequencies and thresholds for corrective action. Parameters will include, but not be limited to ambient air quality, stack and fugitive emissions, injury rates, effluents (wastewater and other) and workplace exposure. The program will consider the applicable parameters defined in the WBG General and Pharmaceuticals EHS Guidelines.	Prior to operations
1.7	External Grievance Mechanism	Genomma will formalize its external grievance mechanism and CSR activities by developing a corporate stakeholder engagement plan and procedures for its external grievance mechanism in accordance IFC PS 1	Prior to Construction
2.1	Pollution Prevention and Management of Industrial Waste	Genomma will develop management plans as part of its new plant to adequately treat industrial waste and to achieve compliance with local law and the applicable WBG EHS and Pharmaceutical Guideline limits.	Prior to operations
3.1	Security Management Plan	Genomma will commit to run its operation in line with the Voluntary Principles on Security and Human Rights, and undertake a security risk assessment for its new plant and existing distribution center. In accordance with PS4, Genomma will also develop a security management plan. The company will assess security risks from and to the community and will develop appropriate policies and procedures to ensure effective oversight and accountability for the security personnel.	Prior to operations