

**Noble Argentina 26959
Environmental & Social Action Plan**

#	Action	Indicator of Completion	Required Completion Date
1	<p>Upgrade Management Systems Develop an integrated management system for social and environmental affairs, quality, and occupational health and safety management (ESMS). The upgraded management system will address identified environmental, health and safety, and social impacts and risks. The Company will design the system to comply with Argentina regulations and IFC performance standards. Noble will implement a training programme on Environmental and Social issues for the workforce, and as part of the content of the induction process for new employees. The Company will implement a formal system for monitoring and reporting environmental and social issues to senior management and for reporting back to IFC.</p>	<p>a) Provide IFC with detailed program components, organization chart, funding information, implementing management system procedures, and activities schedule. b) Management system operational c) Provide IFC with copies of the training materials and a work plan for the implementation of the training programme on Environmental and Social issues for current and new employees d) Present IFC the formal system for monitoring and reporting environmental and social issues to senior management</p>	<p>a) Condition of first disbursement b) 2 years after signing of Loan Agreement c) 9 months after signing of Loan Agreement d) 9 months after signing of Loan Agreement</p>
2	<p>Establish Standalone Environmental Management Department. Establish a department, responsible to senior management. Train and install environmental managers at each plant, ensure close coordination with safety coordinators in each operation, and undertake all activities required to implement environmental policy at all levels of operations, and ensure compliance with host country environmental regulatory and IFC guideline limits.</p>	<p>a) Provide IFC with a copy of the internal memorandum indicating the appointment of the Environment and Social Manager b) Submit adequate evidence to IFC that an adequate plan and appropriate staffing, budgeting, management endorsement, vision and mission statements and associated documentation are in place to institutionalize the functions of the department.</p>	<p>a) Condition of first disbursement b) One year after signing of Loan Agreement</p>

3	<p>Supply chain policy: As part of the ESMS, Noble will develop and implemented a policy to ensure responsible soy purchasing procedures. As part of the policy, Noble will join the Round Table for Responsible Soy (RTRS) based in Argentina. Noble will develop a pilot supplier database for Argentine Chaco:</p> <p>(i) Update data base system to collect information on farmer suppliers in the Charata area in the Chaco region and any other collection centers (acopios) in the Chaco region. The new data collection should include information on compliance with national environmental legislation (illegal land clearing).</p> <p>(ii) Following additional data collection, identify any changes in the company's management of suppliers in the Chaco acopios/collection centers to reduce any detected risk from illegal land clearing in the Chaco supply chain. This shall include informing Chaco farmers with whom the company has soy purchase contracts that Noble expects them to comply with Argentine legislation related to new land clearing.</p>	<p>a) Present to IFC a copy of the supply chain policy for review b) Documentary evidence that Noble is a member of the RTRS c) Provide documentary evidence of the development of a pilot supplier data base:</p> <p>(i.) (a) Description of additional data collection questions and implementation schedule for Chaco supplier database (copy to IFC) (b) Implement supplier database data collection at Chaco collection areas/acopios (notify IFC in writing that this has happened)</p> <p>(ii) (a) Provide IFC with results of additional data collection and recommendations with a time-bound plan for any changes to ESMS. (b) Implement ESMS changes according to proposed schedule agreed with IFC.</p>	<p>a) One year after signing of Loan Agreement b) 3 months after signing of Loan Agreement c)</p> <p>(i) a) 12 months after signing of Loan Agreement b) 18 months after signing of Loan Agreement</p> <p>(ii) a) 22 months after signing of Loan Agreement (for study results and implementation proposal) b) Report on annual progress of implementation in Annual Monitoring Report (AMR)</p>
4	<p>Construction phase: Noble will specify operating policy requirements as well as procedures that must be in place for quality control and compliance with all social (including Occupational Health & Safety issues) and environmental issues during the construction phase (pollution loads, solid waste, etc.).</p>	<p>Provide IFC with a copy of the operating policy and a plan for the implementation to address social and environmental issues during the construction phase</p>	<p>Condition of first disbursement</p>
5	<p>Revise Human Resources Policy/Procedures: Noble will modify existing procedures to fully comply with the requirements of IFC's Performance</p>	<p>Provide copy of new and/or revised procedures demonstrating full transparency</p>	<p>Condition of first disbursement</p>

	Standard 2 Labor and Working Conditions. It will include reference to child labour, non-discrimination, freedom of association and collective bargaining, and will submit the policy to IFC for review.	in accordance with PS2.	
6	Employee grievance redress mechanism: Noble will develop and implement an effective employee grievance redress mechanism	Provide to IFC a copy of the grievance redress mechanism for employees, and the dissemination process	6 months after signing of Loan Agreement
7	Occupational Health & Safety Plan: Plan, fund and staff and occupational health and safety (OH&S) management system including employee training, capabilities for job hazard analyses, training and placement of health and safety coordinators in each operation, emergency response, data collection and analysis. Noble will update its OH&S policy for the plant and fields in accordance to international recognized standards (i.e. OSHAS 18001) and IFC OH&S guidelines and present an Action Plan detailing activities and budget. It should include an Emergency and Contingency Plan.	a) Present to IFC a copy of the updated health and safety policy and plan for review b) Submit evidence to IFC of procedures in place, budgeting, staff to carry out the programme and the Emergency and Contingency Plan. c) Provide copies of certification from licensed/ authorized Certification Body.	a) 9 months after signing of Loan Agreement b) One year after signing of Loan Agreement c) One year after signing of Loan Agreement
8	Fire Drills: Noble will perform at least three fire drills per annum	Present IFC with the report of each the fire drills	Quarterly reports and annually in the AMR
9	Contractors and supply chain: The Company will develop more rigorous reporting requirements in order to ensure that contractors in all their operations and that suppliers are in compliance with a) workers legal benefits; b) wages paid on time, c) safety regulations, and d) ILO Conventions 138 on Minimum Age, and 182 on Worst Forms of Child Labour.	Submit a plan and a record keeping mechanism to register supervisory field visits	9 months after signing of Loan Agreement
10	Operational Safety Plan for site infrastructure: This plan will include the implementation of pavement markings, traffic signals, regulatory signs for speed limits and others, and warning signs, according to international standards, to ensure safety of the workforce.	a)Present the site Operational Safety Plan to IFC for review b)Operational Safety Plan implemented	a) 3 months after signing of Loan Agreement b) One year after signing of Loan Agreement
11	Air emissions: Noble will provide design and	a)Provide evidence that ambient	Condition of Commitment

	<p>equipment assurances that the operational procedures will comply with regulatory limits of Argentina and IFC guideline requirements for ambient air concentrations during the operational phase.</p> <p>Noble will conduct engineering studies and design remedial measures required to resolve dust emissions from its operations</p>	<p>air concentrations during the operational phase will comply with host country regulatory and IFC guideline limits for air emissions.</p> <p>b) Submit documentation acceptable to IFC elucidating professional analysis of root causes of dust problems and associated, proposed remedial measures to resolve the current, elucidated issues.</p>	
12	<p>Effluent: Noble will provide design and equipment assurances that the operational procedures will ensure treated effluents are in compliance with regulatory limits of Argentina and IFC guidelines during the operational phase.</p>	<p>Provide evidence that wastewater management and treated effluent will comply with host country regulatory and IFC guideline limits for discharges to surface water.</p>	Condition of Commitment
13	<p>Pesticide management: Noble will eliminate as feasible WHO Class 1a and 1b chemical formulations for pesticides. The Company will ensure that contractors and suppliers are in compliance with providing adequate personal protection equipment, will provide to IFC the protocol used for cholinesterase testing of workers applying pesticides, and will inform if there is any rotation policy of these workers.</p>	<p>a) Present to IFC the proposal to upgrade Noble's pest management strategy (b) Provide to IFC the protocol for blood testing of workers in contact with pesticides (c) Each year include the blood test results in the AMR d) Inform IFC if there is any rotation policy of workers in contact with pesticides</p>	<p>a) 9 months after signing of Loan Agreement b, c, d) Report annually in AMR</p>
14	<p>Hexane management: The Company will report the results of quarterly samples of hexane concentration in the air.</p>	<p>Submit to IFC reports of hexane concentration in the air</p>	Quarterly reports and annually in the AMR
15	<p>Community Engagement Program. Noble will implement a formal plan for community engagement and grievance mechanism, including a monitoring system and the ability to express</p>	<p>a) Present to IFC a copy of the corporate community engagement community engagement and grievance</p>	6 months after signing of Loan Agreement

	<p>concerns. The Company will ensure it is clearly communicated by posting on the company website and included in relevant written public communications.</p> <p>Noble will develop clear safety guidelines to be enforced on all contracted transport of hexane and raw materials. The Company has agreed to avoid passing through Timbues, and to use exclusively the access from the north end. Such Company policy will be listed in Noble's website (www.noblegrain.com.ar/nobleinfraestructura.html).</p>	<p>mechanism, including the implementation and public information plan for review</p> <p>b) Present to IFC a copy of the safety guidelines to be enforced on all contracted transport of hexane and raw materials, including the implementation and public information plan for review</p>	
--	--	--	--