COLOMBIA/ALQUERIA/28492
ENVIRONMENTAL AND SOCIAL ACTION PLAN

Task	*Indicator of Completion*	*Required Completion Date*
1. **ISO 9001:2008 certification.** Obtain certification at both UNO & UNA production plants.	▪ Provide IFC a copy of the registration certificates	▪ November 2010
2. **UNO & UNA HACCP certification.** Obtain certification schedule at both UNO & UNA production plants.	▪ Provide IFC a copy of the registration certificates	▪ November 2010 for certification at UNO ▪ June 2011 for certification at UNA
3. **Community grievance mechanism (Lineaetica expansion).** Develop and implement a grievance mechanism to include external grievances/complaints. This grievance mechanism will describe the process to log complaints, people responsible, timetable to respond, monitoring of mitigation measures, and response.	▪ Present the procedure to IFC for review and comment. ▪ Implementation of grievance mechanism ▪ Provide summary data to IFC in AMR on comments received (type of issue, number of comments/calls received, origin of comment/calls, etc.) and how they were managed and resolved.	▪ 3 months after loan signature ▪ 6 months after loan signature ▪ AMR (ongoing)
4. **Assessment of M&A targets** Company will review the environmental and social conditions of M&A targets to ensure they will meet the requirements of the PS; if not they must develop a plan and implement the plan to ensure the acquisitions will meet the requirements of the PS.	▪ Present assessment of PS-based due diligence to IFC ▪ If required, present plan and implementation schedule to ensure acquisitions will comply with the requirements of the PS	▪ Upon completion of due diligence activities centered on acquisition of M&S targets
5. **Government environmental audit to IFC.** (audit conducted the week of Nov 16, 2009).	▪ Provide IFC with a copy of the CAR audit ▪ Provide signed letter from senior management stating agreement of the company to implement any additional requirements stemming from the audit. ▪ Report on progress of implementation and results in next AMR.	▪ When available from CAR ▪ Within one month of receipt of audit report (or same time frame as stipulated by CAR) ▪ First AMR

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6. **<u>Underground water extraction license for UNS plant.</u>** Confirm application is successful.	▪ Provide a copy of the license/permit to extract to IFC upon receipt from the Colombian authorities	▪ Upon receipt from regulatory authority
7. **<u>Hydrogen Peroxide levels in UNS plant.</u>** Complete installation of new CLAUGER air conditioning technology to ensure ambient levels of hydrogen peroxide in packing area are below IFC's referenced OH&S limits in the General EH&S Guidelines.	▪ Once new CLAUGER system is installed and tested, provide IFC monitoring results, undertaken by a competent authority or third party, showing acceptable levels of hydrogen peroxide in packing areas	▪ Provide monitoring results at the conclusion of CLAUGER system testing – end of May 2010 ▪ Provide monitoring results after CLAUGER system is fully operational – end of September 2010
8. **<u>Hydrogen Peroxide levels in UNO & UNA plants.</u>** Confirm current packing activities in UNO and UNA plants are not presently exposing workers to unhealthy levels of hydrogen peroxide. If levels are too high, develop interim mitigation plan to reduce levels to below IFC's limits until CLAUGER system is operational.	▪ Provide IFC with documented evidence (monitoring performed by a competent authority or third party) showing acceptable levels of hydrogen peroxide in UNO and UNA plants. ▪ If report indicates levels are too high, develop a mitigation plan including schedule to reduce hydrogen peroxide to acceptable limits. Submit mitigation plan to IFC for approval. ▪ Post implementation of mitigation plan, monitor levels in previously high areas, using a competent authority or third party; submit monitoring data to IFC to demonstrate acceptable levels of hydrogen peroxide in ambient conditions.	▪ Condition of disbursement ▪ Condition of disbursement ▪ 3 months after IFC approves mitigation plan
9. **<u>Hydrogen Peroxide levels in UNO & UNA plants.</u>** Provide confirmation of decision to install CLAUGER air conditioning technology in UNO & UNA plants.	▪ Provide evidence of decision to purchase and install CLAUGER system ▪ Once new CLAUGER	▪ Upon decision being made by responsible party within Alqueria ▪ Provide monitoring

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	system is installed and tested, provide IFC monitoring results, undertaken by a competent authority or third party, showing acceptable levels of hydrogen peroxide in packing areas	results at the conclusion of CLAUGER system testing ▪ Provide monitoring results after CLAUGER system is fully operational
10. <u>Construction of new WWTP at Cali plant.</u> Confirm that discharges from the updated WWTP meet local regulatory limits (as called for under the present local government resolution).	▪ Provide IFC with monitoring data to demonstrate compliance with effluent limits in regulatory requirements and dumping permits as applicable	▪ 3 months after commissioning of the WWTP and ongoing in the AMR
11. <u>Operating performance of the new UNS WWTP.</u> Confirm that discharges meet local regulatory/permit limits.	▪ Provide IFC with monitoring data that shows WWTP performance meets regulatory limits and requirements	▪ 3 months after commissioning of WWTP and ongoing in the AMR
12. <u>Boiler operation at UNS.</u> Model air emissions dispersal to determine impact upon receptors (see Annex 1.1.1 of the General EH&S Guidelines). Based upon model results, propose and implement mitigation measures to ensure emissions are protective of public health such that they meet the more stringent of either the Colombian ambient air quality regulations or the WHO ambient air quality standards as contained in the EH&S Guidelines.	▪ Provide IFC with air dispersion modeling results to characterize the potential impact of emissions upon receptors. ▪ Provide IFC with a mitigation plan for approval, including actions, responsible people, capex and timeline to show how air emissions will be protective of public health, i.e. not exceed the more stringent of either Colombian regulations or WHO ambient limits as contained in the General EH&S Guidelines. ▪ Implement mitigation measures to ensure compliance with IFC guideline levels; provide monitoring	▪ Condition of disbursement ▪ Condition of disbursement ▪ As per mitigation plan

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	data as evidence of compliance with IFC's limits	
13. Boiler Operation at UNO. Complete current natural gas pipe engineering works to ensure boiler operates on natural gas fuel	▪ Once boiler is operating on natural gas, monitor for parameters contained in the General EH&S Guidelines; submit monitoring data to IFC as evidence of compliance with IFC's EH&S Guidelines air emissions limits	▪ June 1st 2010
14. Emergency Response. Develop and implement emergency response procedures to demonstrate that all production facilities have been adequately assessed for emergency response, particularly the roles, capacity and relationship of local emergency responders that may be required to assist plant responders in the event of an emergency.	▪ Submit emergency procedures for all production plants to IFC for review and comment. ▪ Provide IFC with evidence that procedures have been implemented.	▪ 6 months after loan signature ▪ 1 year after loan signature
15. Receipt, storage, handling and use of ammonia. Review current procedures related to ammonia use on site; ensure procedures are as stringent as those referenced under relevant industry bodies such as the International Institute of Ammonia Refrigeration (www.iiar.org). If not, update and implement procedures to best practice levels.	▪ Provide IFC with a gap analysis/comparison between existing ammonia related procedures and best practices as found at www.iiar.org. ▪ If gaps are found to exist, develop a plan to close the gaps and provide IFC with a copy of the plan for review and comment. ▪ Implement measures to ensure the most stringent procedures are in place at all facilities; provide IFC with updated procedures and evidence of implementation of new procedures.	▪ 6 months after loan signature ▪ 9 months after loan signature ▪ 1 year after loan signature
16. Truck driving training program. Implement driver training programs for truck and 'car' drivers (i.e., those delivering milk to retail outlets) within all business units.	▪ Provide IFC with documented evidence of training programs by submitting adequate evidence to	▪ 6 months after loan signature. ▪ AMR (ongoing)

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	IFC of program planning, procedures, required equipment, budgeting, and staff to carry out the program. ▪ Maintain training records of those receiving driver training and submit with AMR	
17. Review Security Contract. Company must confirm that contracted security services apply the principle of proportionality and that security personnel have clear instructions on the objectives of their work and permissible actions. Instructions should be based on applicable law and professional standards and adhere to best international practices as included in the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials and/or the Voluntary Principles on Security and Human Rights	▪ Provide IFC with documented evidence that security contracts and arrangements adhere to the stated principles and international best practices	▪ 3 months after loan signing