Surpapel (Ecuador) Environmental and Social Action Plan (May 22, 2020)

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| **Action #** | **Type of Action** | **Deliverable** |
| **PS 1: Assessment and Management of Environmental and Social Risks and Impacts** | | |
|  | Strengthen and implement the corporate environmental and social management system (ESMS) at the Surpapel Group companies in line with the requirements of Performance Standard 1 (“PS1”), including integration of supply chain management (covered under Performance Standard 2) and climate risk. | ESMS manual (draft), which includes a procedure to identify and manage potential climate risks  ESMS manual (final) |
|  | Carry out a review of environmental and social resources and capacity to determine sufficiency to implement and monitor the E&S management system and to implement the ESAP. | Evidence of sufficient staffing with competent and qualified staff. |
|  | Carry out stakeholder mapping for Surpapel and Repapers. Define and implement a policy and procedure to identify stakeholders and communication mechanisms, including a grievance mechanism, in line with PS 1. The stakeholder engagement plan will include a mechanism to report on E&S performance. | Stakeholder mapping for Surpapel and Repapers  Stakeholder engagement plan for Surpapel and Repapers, including grievance mechanism and E&S reporting mechanism. |
| **PS 2: Labor and Working Conditions** | | |
|  | Revise human resources policy and procedures to be in line with PS 2, including retrenchment, grievance mechanism, etc. | Revised human resources policy and procedures for each company in the Surpapel Group, including retrenchment policy and grievance mechanism. |
|  | After building capacity to map suppliers, carry out mapping of Tier 1 / primary suppliers of Repapers. | Hire trainers to build capacity  Written evidence of training on supply chain mapping  Documented mapping of Tier 1 suppliers |
|  | Develop supplier code of conduct acceptable to MIGA for third-party suppliers of recycled local paper and cardboard. | Supplier Code of Conduct |
|  | Develop and implement supplier agreements or guidelines at Repapers in line with the MIGA Performance Standards (“PSs”), incorporating at a minimum supplier code of conduct covering health and safety requirements, labor issues and harmful child labor and forced labor controls, and grievance mechanism in accordance with the PSs and ensure that the company grievance mechanism is accessible to the suppliers and known to them to be able to access | Supplier agreement (Sample template)  Evidence of implementation |
|  | Develop a monitoring plan outlining procedures and processes to be implemented by the Project Enterprise to monitor direct suppliers for child labor and forced labor, in compliance with the PSs.  Start implementation of monitoring plan | Monitoring plan  Written evidence of implementation |
|  | Engage an external audit of the supply chain to verify implementation of actions related to human rights.  Develop corrective action plan to address findings of audit. | Verification methods / Request for proposal  Hiring of external consultant  External audit of supply chain  Corrective action plan to address findings |
| **PS 3: Resource Efficiency and Pollution Prevention** | | |
|  | Review environmental management and monitoring plans and procedures to incorporate relevant emission and effluent limits referenced in the applicable World Bank Group environmental, health and safety guidelines. | Revised environmental management and monitoring plans and procedures |
| **PS 4: Community Health, Safety and Security** | | |
|  | Incorporate community, as appropriate, in emergency preparedness and response plans for each company. | Written evidence of community involvement in emergency response drill |
|  | Carry out a security risk assessment to assess security risks for the Surpapel Group (including the three companies).  Based on the findings of the security risk assessment, develop a security management plan in line with Performance Standard 4 for the Surpapel Group (including the three companies). | Security risk assessment  Security management plan |