

## Promigas Environmental and Social Corrective Action Plan (CAP)

#	Action	By whom	Deadline
1.			
(a)	<b><u>Complete the “Best Management Practices Exchange Program”.</u></b> Promigas will complete the “Best Management Practices Exchange Program” assessment currently being conducted. This Program will include a detailed implementation action plan to close environmental, health and safety, and social management system gaps across the majority owned (>50%) portfolio companies.	<b>Promigas</b>	Complete Exchange Program and develop action plan for closing gaps within 1 year of IFC investment
(b)	<b><u>Commence action plan implementation to close environmental, health and safety, and social management system gaps across the portfolio companies.</u></b> The action plan will have a maximum duration of 5 years, by when all majority owned (>50%) companies must have implemented the best guiding principles and management systems such as those used by Promigas. The implementation plan will prioritize initial efforts to those companies which lack or have weak management systems. The Company will provide yearly update reports on implementation progress through the annual environmental monitoring report presented to IFC.	<b>Promigas</b>	Commence action plan implementation within 1 year of IFC investment.
(c)	<b><u>Complete Implementation of “Best Management Practices Exchange Program” action plan.</u></b> At the end of year 5 of the action plan implementation startup all majority owned (>50%) portfolio companies will be following the best guiding principles and environmental, health and safety, and social management systems such as those used by promigas.	<b>Promigas</b>	Complete action plan by year 6 of IFC investment.
2.	<b><u>Environmental, health and safety, and social Commitment towards Minority owned portfolio companies.</u></b> Where Promigas is a minority investor, they will do their best commercial effort to convince other shareholders to transfer the best guiding principles and environmental, health and safety, and social management systems such as those used by Promigas	<b>Promigas</b>	Submit Letter of Commitment upon signing of IFC investment
3.	<b><u>Formalize inter-company meetings.</u></b> Promigas will formalize HSEQ meetings between portfolio company staff.	<b>Promigas</b>	Program in place within 6 months of IFC investment

4.	<b><u>Develop appraisal protocols.</u></b> Promigas will develop a comprehensive Appraisal Protocol to assess all potential projects (existing and new). This protocol will include a detail roll of Promigas HSEQ team and a detailed checklist listing all potential issues one would expect from the construction and/or operation of a natural gas transmission or distribution project, which would subsequently need to be thoroughly completed. If deemed necessary, Promigas will hire external consulting firms to aid in their assessment.	<b>Promigas</b>	Develop appraisal protocols within 4 months of IFC investment
5.	<b><u>Prepare and submit proposed annual environmental monitoring report (AMR) format for IFC approval.</u></b> Devise and submit proposed annual monitoring report format to IFC. Report should be designed to facilitate IFC's understanding of the compliance status of all facilities, outstanding compliance issues and target resolution dates, and updates of the "Best Management Practices Exchange Program" activities. The report should be designed to have maximum utility for Promigas management and informational brevity for IFC.	<b>Promigas</b>	Prior to first disbursement of IFC loan
6.	<b><u>Submit annual environmental monitoring report (AMR) for IFC review.</u></b>	<b>Promigas</b>	Annually