

ALMACENES DEL NORTE – PERU
Environmental and Social Action Plan (ESAP)

No.	Aspect	Action	Deliverable	Delivery date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Environmental and Social Management System	1. Update the Environmental and Social Management System (“ESMS”) for the construction phase to include: i) policies; ii) identification of risks and impacts; iii) management programs; iv) organizational capacity and competency; v) emergency preparedness and response; vi) stakeholder engagement; vii) external communication and grievance mechanisms; viii) ongoing reporting to affected communities; and ix) monitoring and review.	1. ESMS Manuals for the construction phase.	1. 30 days prior to the start of construction.
		2. Implement the ESMS for the construction phase.	2. Evidence of implementation.	2. As part of the Environmental and Social Compliance Report (ESCR).
		3. Update the ESMS for the operation phase.	3. ESMS Manuals for the operation phase.	3. 30 days prior to the start of operation.
		4. Implement the ESMS for the operation phase.	4. Evidence of implementation.	4. As part of the ESCR.
1.2	Policy	1. Update the Safety, Occupational Health, and Environment Policy to include the Project’s commitment to the safety and health of neighboring communities.	1. Updated Safety, Occupational Health, and Environment Policy.	1. 30 days prior to the start of construction.
		2. Disseminate the updated Safety, Occupational Health, and Environment Policy.	2. Evidence of dissemination.	2. As part of the ESCR.
1.3	Identification of Risks and Impacts	1. Update, for the construction phase, the environmental, social, and occupational health and safety (“OHS”) hazard identification and risk assessment (“HIRA”) matrices, including mitigation measures for such risks.	1. Updated HIRA matrices for the construction phase.	1. 30 days prior to the start of construction.
		2. Develop, for the construction phase, a procedure to identify and assess risks and impacts to the community.	2. Procedure to identify and assess risks and impacts to the community.	2. 30 days prior to the start of construction.
		3. Implement, for the construction phase, the procedure to identify and assess risks and impacts to the community.	3. Matrix to identify and assess risks and impacts to the community.	3. As part of the ESCR.
		4. Develop, for the operation phase, the environmental, social, and OHS hazard identification and risk assessment (“HIRA”) matrices, including mitigation measures for such risks.	4. HIRA matrices for the operation phase.	4. 30 days prior to the start of the operation phase.
		5. Implement, for the operation phase, HIRA matrices according to item 1.3.4.	5. Evidence of implementation.	5. As part of the ESCR.
	Gender Risks	1. Identify and assess the Project’s gender risks, including control measures for their prevention.	1. Identification of gender risks.	1. 90 days after signing the loan agreement.
		2. Implement gender risk prevention control measures.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Develop a gender policy that includes elements to prevent discrimination, on inclusion, sexual harassment, gender-based violence, and cooperation with the judicial system in investigating complaints of gender-based violence.	3. Gender policy.	3. 90 days after signing the loan agreement.
		4. Implement the gender policy.	4. Evidence of implementation.	4. As part of the ESCR.
		5. Develop an Employee Code of Conduct that includes enforcement and monitoring procedures and establishes zero tolerance for gender-based violence, including sexual harassment on the street.	5. Code of Conduct.	5. 90 days after signing the loan agreement.
1.4	Management Programs	1. Develop management programs for the operation phase of the Project.	1. Management programs for the operation phase.	1. 30 days prior to the start of operation.
		2. Implement management programs for the operation phase.	2. Evidence of implementation.	2. As part of the ESCR.
1.5	Organizational Capacity and Competency	1. Ensure, during the construction phase, the availability of the necessary environmental and social oversight personnel for the implementation of the ESMS.	1. Evidence of personnel availability.	1. 15 days prior to the start of the operation phase.

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1.6	Emergency Preparedness and Response	1. Update the Emergency Plan for the construction phase of the Project to include: i) the effects of climate events on its HIRA matrices; and ii) the identification of risks to which the Company's assets and its supply chain are subject.	1. Updated Emergency Plan.	1. 30 days prior to the start of construction.
		2. Implement the Emergency Plan.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Develop an Emergency Plan for the operation phase of the Project to include: i) administrative and operational actions that are also applicable to contractors and subcontractors to control and mitigate potential harm to direct and indirect workers, people in potentially affected communities within the project's ADI, the environment, and infrastructure; and ii) identified climate risk scenarios (natural disasters and climate change) most relevant to the Project.	3. Emergency Plan for the operation phase.	3. 30 days prior to the start of operation.
		4. Implement the Emergency Plan for the operation phase.	4. Evidence of implementation.	4. As part of the ESCR.
1.7	Monitoring and review	1. Develop procedures to evaluate ESMS management in the construction phase that include key performance indicators (KPIs).	1. ESMS performance evaluation procedures for the construction phase.	1. 15 days prior to the start of construction.
		2. Implement the ESMS performance evaluation procedure for the construction phase.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Prepare, for the construction phase, a compliance matrix for all legal and contractual obligations, which includes: i) the control organism that issues the permit or license; ii) the dates of issuance and validity; and iii) the internal persons responsible for monitoring renewals.	3. Licenses and permits compliance matrix.	3. 30 days prior to the start of construction.
		4. Periodically update the E&S licenses and permits matrix for the Project's execution.	4. Updated E&S licenses and permits matrix.	4. As part of the ESCR.
		5. Develop procedures to evaluate ESMS management in the operation phase, which include key performance indicators (KPIs).	5. ESMS performance evaluation procedures for the operation phase.	5. 30 days prior to the start of operation.
		6. Implement the ESMS performance evaluation procedure for the operation phase.	6. Evidence of implementation.	6. As part of the ESCR.
		7. Keep the legal and contractual obligations compliance matrix up to date.	7. Updated legal and contractual obligations compliance matrix.	7. As part of the ESCR.
1.8	Stakeholder Engagement	1. Develop a Project Stakeholder Engagement Plan ("SEP") that includes: i) a summary of previous stakeholder engagement activities; ii) the stakeholder identification and mapping; and iii) a description of future stakeholder engagement activities, including social investment programs.	1. Stakeholder Engagement Plan.	1. Prior to First Disbursement.
		2. Implement the SEP.	2. Evidence of implementation of the SEP.	2. As part of the ESCR.
1.9	Grievance Mechanisms for Affected Communities	1. Develop a Grievance Mechanism for Communities and stakeholders affected by the Project that includes: i) a detail of the channels for receiving complaints; ii) a description of the documentation system for recording, tracking, analyzing, and resolving complaints; iii) details of response times and records; iv) a description of the mechanisms for communicating and disseminating the submitted and processed complaints; and v) a detail of how the mechanism will be disclosed to the ADSI and AISI communities and relevant stakeholders.	1. External Grievance Mechanism.	1. 30 days prior to the start of construction.
		2. Implement the Grievance Mechanisms for Communities.	2. Grievance Mechanisms for Communities (in matrix form).	2. As part of the ESCR.
1.10	Ongoing Reporting to Affected Communities	1. Disclose information on: i) the environmental and social performance of the Project; ii) responses to complaints filed; and iii) the external grievance mechanism.	1. Evidence of disclosure.	1. As part of the ESCR.
PS 2: Labor and Working Conditions				
2.1	Human Resources Policies and Procedures	1. Develop a Human Resources Policy for the Project, to cover its direct workers and contractors in its scope.	1. Human Resources Policy.	1. 30 days prior to the start of construction.
		2. Disclose the Human Resources Policy.	2. Evidence of disclosure.	2. 15 days prior to the start of construction.
2.2	Working Conditions	1. Develop Internal Labor Regulations for its own employees to include general provisions for contractors, suppliers, and visitors.	1. Internal Labor Regulations for the Project.	1. 30 days after signing the loan agreement.

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		2. Disclose the Internal Labor Regulations.	2. Evidence of disclosure.	2. 60 days after signing the loan agreement.
2.3	Employee grievance mechanism	1. Develop an internal grievance mechanism open to all Project workers, including contractors, to include: i) details of the channels for receiving complaints; ii) description of the documentation system for recording, tracking, and analyzing complaints and solutions; iii) details of the defined timeframes and response records; iv) description of the mechanisms for the communication and disclosure of grievances filed; v) the ability to capture complaints of harassment or gender-based violence; and vi) the ability to respect the anonymity of the complainant and a guarantee of zero tolerance for retaliation against those who file a complaint.	1. Internal grievance mechanism.	1. Prior to First Disbursement.
		2. Implement the Internal grievance mechanism.	2. Employee grievance report (in matrix form).	2. As part of the ESCR.
2.4	Occupational Health and Safety	1. Take the required occupational hygiene measurements during the construction phase according to the HIRA matrices.	1. Evidence of implementation.	1. As part of the ESCR.
		2. Take the required occupational hygiene measurements during the operation phase according to the HIRA matrices.	2. Evidence of implementation.	2. As part of the ESCR.
2.5	Provisions for People with Disabilities	1. Define specific provisions to ensure the full development of workers with disabilities.	1. Specific provisions for workers with disabilities.	1. 30 days prior to the start of construction.
2.6	Workers Engaged by Third Parties	1. Develop and implement a contractor management plan that includes measures to monitor compliance with the environmental, social, occupational health and safety, and labor policies, procedures and plans.	1. Contractor management plan.	1. Prior to the start of construction.
		2. Implement the contractor management plan.	2. Evidence of implementation of the contractor management plan.	2. As part of the ESCR.
		3. Train contractors and subcontractors on the following topics: i) Environmental and Social Policies, OHS, labor, and the Code of Conduct; and ii) zero tolerance for gender-based violence, sexual harassment, workplace harassment, and discrimination.	3. Evidence of training.	3. Prior to the start of construction and then periodically as part of the ESCR.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Resource Efficiency – Greenhouse Gases	1. Develop an annual greenhouse gas ("GHG") emissions inventory including scope 1, 2, and 3.	1. GHG emissions inventory.	1. 1 year after signing the loan agreement (baseline) and then as part of the ESCR.
3.2	Resource Efficiency – water consumption	1. Keep a control log of the volumes of water used for the construction phase.	1. Control log of the volumes of water used for the construction phase.	1. As part of the ESCR (control log of the volumes).
		2. Keep a control log of the volumes of water used for the operation phase.	2. Control log of the volumes of water used for the operation phase.	2. As part of the ESCR (control log of the volumes).
		3. Conduct, for the construction phase, the monitoring on: i) the hazardous and non-hazardous solid waste generated and disposed of; ii) domestic effluents; and iii) the consumption of fuels, lubricants and oils.	3. Monitoring logs.	3. As part of the ESCR.
		4. Evaluate alternatives to eliminate, reduce, reuse, or recycle food packaging from employees, contractors, and subcontractors.	4. Evaluation report.	4. No later than 30 days after signing the loan agreement.
		5. Implement the chosen alternatives to eliminate, reduce, reuse, or recycle food packaging from employees, contractors, and subcontractors.	5. Evidence of implementation.	5. As part of the ESCR.
3.3	Pollution Prevention	1. Develop a procedure for handling hazardous materials (e.g., fuels, lubricating oils, paints, solvents), which will include, among other issues, the following: i) storage conditions in accordance with national regulations or accepted international	1. Procedure for handling hazardous materials.	1. 30 days prior to the start of construction.

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		standards; ii) the need to keep material safety data sheets (MSDS) for each product; iii) substance incompatibility information; and iv) a contingency plan in case of spills or accidents.		2. 30 days prior to the start of operation.
		2. Implement the procedure for handling hazardous materials.	2. Evidence of implementation.	3. As part of the ESCR.
PS 4: Community Health, Safety, and Security				
4.1	Community Health and Safety	1. Prepare a Road Safety Plan for the construction phase.	1. Road Safety Plan for the construction phase.	1. 30 days prior to the start of construction.
		2. Implement the Road Management and Safety Plan for the construction phase.	2. Evidence of implementation.	2. As part of the ESCR.