

Environmental and Social Review Summary (ESRS) Almacenes del Norte - Peru

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1. General Information of the Project and Scope of IDB Invest's Environmental and Social Review

Ventanilla S.A.C. Project, a special purpose company established in Peru (the “Client” or the “Company”), was incorporated to build and operate the Almacenes del Norte - Callao Logistics Park located in the district of Ventanilla, Constitutional Province of Callao, Callao region, Peru (the “Project or “ADN”).

The Project is located 20 km north of Jorge Chavez International Airport, 25 km from the Port of Callao and 40 km from the future Port of Chancay. The site has a total area of 504,220 m² and a leasable area of 288,044 m² (57% of the total). Construction began in 2022 (currently the earthworks phase is almost complete), and will be completed in 2027, with four types of warehouses: i) small, with areas of 150 m²; ii) medium, with areas between 200 and 400 m²; iii) large, with areas between 3,000 and 6,000 m²; and iv) “Build To Suit”, with areas greater than 10,000 m².

The environmental and social due diligence (“ESDD”) included a visit to the site, meetings with the director, managers, site residents, and operating personnel, as well as interviews with workers and community representatives in the area of direct influence (“ADI”) of the Project. The ESDD also included a review of the Client's relevant environmental and social information, including its Environmental and Social Management System (“ESMS”), occupational health and safety and emergency plans and programs, the environmental permits obtained, among others.

2. Environmental and Social Categorization and Rationale

The Project has been classified as a Category B operation according with IDB Invest’s Environmental and Social Sustainability Policy since for the construction phase it will likely generate, the following impacts and risks: i) particulate matter generation (dust) and combustion gas; ii) the generation of both hazardous and non-hazardous solid and liquid waste; iii) domestic wastewater generation (black and gray); iv) ambient noise pollution and vibrations; v) impact on community health and safety; vi) an increase in gender risks due to the influx of external personnel; and vii) impacts on the communities in the ADI due to the increase in heavy vehicle transport, deterioration of road infrastructure, noise, and dust. During the operation phase, risks are mainly related to i) the generation of both hazardous and non-hazardous solid and liquid waste; and ii) increased vehicle traffic. These impacts and risks are deemed to be of medium-low intensity and can be managed with standard control measures.

The Performance Standards (PS) triggered by the Project are: i) PS1: Assessment and Management of Environmental and Social Risks and Impacts; ii) PS2: Labor and Working Conditions; iii) PS3: Resource Efficiency and Pollution Prevention; and iv) PS4: Community Health, Safety, and Security.

3. Environmental and Social Context

3.1 General Characteristics of the Project's site

The Project is located at km 4.5 of the road to Los Delfines beach, in the district of Ventanilla, Province of Callao, department of Lima; on an area of 504,220 m², which corresponds to the total area of 6 amassed lots, and 2 additional lots that were duly acquired by the Client through mercantile transactions. The warehouses will be used for the packing, storage, transportation, and distribution of packaged goods from local factories, Jorge Chávez Airport, and the Port of Callao, to be leased to third parties.

The Project is located approximately 1,700 meters from the Ventanilla Wetlands Regional Conservation Area.¹ The site, however, is characterized by being a heavily disturbed area² and is classified as a Light Industrial (I2) land use area.³ Within its area of direct social influence ("ADSI") are the human settlements of Felix Moreno, Defensores de la Patria, Ladera del Cerro Cachito, San Pablo, Oasis and the Apurímac Homeowners Association ("Asociación de Viviendas Apurímac").

The region where the Project is located is characterized by being arid, experiencing lack of rainfall in all seasons and with a temperate climate during most of the year. The Project area is in the Desert Life Zone and there are no species of national conservation status.

3.2 Contextual Risks

The Constitutional Province of Callao is one of the smallest and most densely populated in Peru. It is home to one of the main and most important seaports in South America: the Port of El Callao. It has also been known, however, to face problems of violence and crime, and to experience high levels of delinquency due to factors such as poverty, drug trafficking, and the presence of street gangs and criminal gangs. Its homicide rates are higher than the national average and that of Metropolitan Lima.⁴

4. Environmental Risks and Impacts and Proposed Mitigation and Compensation Measures

4.1 Assessment and Management of Environmental and Social Risks and Impacts

4.1.a E&S Assessment and Management System

¹ An ecosystem located within the desert coast of Peru, formed by groundwater upwelling from the Chillón river basin, as well as marine infiltration from the Ventanilla beach.

² Commercial (warehouses, workshops), recreational (Costa Azul beach), and private use (land for sale, cemeteries); as well as the presence of the Lima Potable Water and Sewage Service ("SEDAPAL") canal, which is located near one of its borders.

³ Granted by the Urban Planning and Cadastre Management Office of the Urban Development Management Office of the Provincial Municipality of El Callao, which reassigned the Light Industrial Zoning (I2) and Special Regulation Zoning (ZRE) to an area of 455,674.63 m², in which the Project will be developed.

⁴ <https://www.gob.pe/institucion/mininter/informes-publicaciones/3715223-indicadores-para-la-gestion-de-la-seguridad-ciudadana-en-callao>

ADN has adopted an Environmental Management Plan (“EMP”) for the construction phase of the Project, which includes: (i) a summary of applicable legislation; (ii) an internal organizational scheme for managing environmental and social issues, along with the names of the parties responsible for performing these tasks; (iii) the identification, evaluation, and control of environmental aspects and impacts; (iv) an emergency response plan; (v) a training program; (vi) procedures for reporting and investigating environmental accidents; (vii) detailed consultation and communication protocols; (viii) provisions for the management of hazardous, non-hazardous, and special solid and liquid waste; (ix) a monitoring program; (x) protocols for managing clients, suppliers, and services; and (xi) guidelines for evaluating the Company's environmental and social performance. Nevertheless, it will update its ESMS, extend it to the operation phase, and include the following elements: 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.

To date, the Client has completed the environmental regularization process in conformity with the environmental legislation in force, for which it has submitted the Preliminary Environmental Assessment (“PEA”) and obtained the approval of the Environmental Impact Statement (“EIS”) for the Project. Nevertheless, for the last 2 lots acquired, the Company is currently preparing a Supporting Technical Report (“STR”), which will allow it to standardize the area in line with the Project's activities.

4.1.b Policy

ADN has a Safety, Occupational Health, and Environment Policy through which it undertakes to prevent pollution and care for the environment, protect the safety and health of its workers, and ensure legal compliance in environmental and occupational health and safety (“OHS”) matters. Nevertheless, it will update this policy to include its commitment to the safety and health of neighboring communities. Once approved, it will disseminate it among its workers, contractors, and the communities in the Project's ADI.

4.1.c Identification of Risks and Impacts

As part of the PEA preparation process and subsequent EIS approval, the Client conducted a hazard identification and risk assessment (HIRA) process for the environmental, OHS, and socioeconomic components of the Project. Nevertheless, ADN will: i) prepare a procedure to identify the Project's social risks during its construction and operation phases; and ii) translate them into a HIRA matrix.

4.1.c.i Gender Risks

The Client will identify the gender risks of all Project activities and develop and implement measures to manage them. These will include, among others: i) policies on non-discrimination, inclusion, sexual harassment, gender-based violence, and cooperation with the judicial system in investigating complaints of gender-based violence; and ii) 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.

4.1.c.ii Climate Change Exposure

Historically, the Project location has not been exposed to droughts; however, due to extreme events caused by the El Niño Southern Oscillation ("ENSO" or the "El Niño Phenomenon") and exacerbated by climate change, droughts have been intensifying. In terms of coastal hazards, there is also a high exposure to sea level rise within a 5 km buffer zone of the Project site, which could be exacerbated by the effect of climate change. The Project area also faces high exposure to tsunamis and low exposure to extreme rainfall events. As a result of the above, the Project has considered landfills of up to 3.00 meters above sea level within the site, which will mitigate the impacts of a possible tsunami on the warehouse infrastructure. In addition, the Project includes storm drains in its road design to drain any water generated by rainfall events caused by extreme climate change.

Given the above, the Client will update its Emergency Plans to consider the climate change scenarios most relevant to the Project and will include: i) the effects of climate events on its HIRA matrices; and ii) the identification of risks affecting the Company's assets and its supply chain.

4.1.d Management Programs

The Project has an Environmental Management Plan ("EMP") that defines the measures to prevent and mitigate the impacts identified for its construction and operation phases. The EMP includes: i) a plan for preventive, mitigating, and corrective measures; ii) an environmental adequacy program; iii) a solid waste minimization and management plan; iv) an environmental monitoring and follow-up program; v) a contingency plan; and vi) a closure plan.

4.1.e Organizational Capacity and Competency

ADN's General Management monitors compliance with the Project's ESMS. The Client has also contracted an external supervisory company, which, among other areas of action, is responsible for the implementation of the ESMS.

The external company currently has a Head of Occupational Health and Safety and Environment (“OHS&E”) who reports to the Site Resident, the Project Manager, and the Sustainability Coordinator. The Project also has a Head of Social Management, who reports directly to the Sustainability Coordinator and is responsible for overseeing external companies contracted to provide support in public relations and legal-environmental compliance.

4.1.f Emergency Preparedness and Response

ADN's Emergency Response Plan (“ERP”) contains measures to avoid or mitigate damage to the environment, property, employees, suppliers, and visitors to the Project in the event of an emergency event. The plan includes: i) a list of the personnel responsible for emergency management; ii) a detailed description of the types of emergencies according to their source of origin (technological⁵ or natural⁶); iii) a description of the emergency levels (minor, medium, and severe); iv) information and communications management protocols (emergency plans); v) a detailed description of the technical means of protection and response (alarms, firefighting equipment, emergency response equipment, safety signs, etc.); vi) a list of the human resources available (brigade members,⁷ occupational physician, among others); vii) a description of the functions that personnel must perform before, during, and after an emergency; and viii) a flow chart of how communications should be handled.

The Plan provides that, in the event of a major emergency, ADN must request support from external agencies such as the fire department, Red Cross, national police, among others. It also provides for drills to be carried out at least once a year, with or without prior notice, for earthquakes, fires, accidents, among others.

Nevertheless, the Client will update its emergency plan prior to the start of the Project’s operation phase.

4.1.g Monitoring and review

The Client, under its environmental permit:⁸ i) is subject to inspections, evaluations, and environmental audits⁹ by the Environmental Evaluation and Oversight Agency (“OEFA”, by its acronym in Spanish); and ii) must prepare periodic compliance reports of the commitments subscribed for the Project in its EMP for the corresponding authorities. In addition to the above, the Client will report the results of the monitoring program for the following components: i) air quality; ii) ambient noise; iii) domestic; and iv) flora and fauna.

⁵ Fires and/or explosions; spills; leaks of hazardous substances; incidents with hazardous materials and/or waste; social disturbances; first aid: injured or wounded persons.

⁶ Emergencies caused by earthquakes: collapse of facilities, cave-ins or landslides on slopes, deposits, and dumps; emergencies caused by adverse weather: strong winds, hailstorms, electrical storms; emergencies caused by natural phenomena: hurricanes.

⁷ Duly trained and qualified first aid, fire, environmental emergency, evacuation, and rescue brigade members authorized by the occupational physician.

⁸ Preliminary Environmental Assessment (“PEA”) and Environmental Impact Statement (“EIS”).

⁹ The schedule for these visits is informed by the OEFA to the Client at the beginning of each year. Nevertheless, the auditing entity has the authority to conduct unannounced inspections.

As required by its EMP, ADN will define an internal audit plan for both the construction and operation phases of the Project to evaluate its environmental, social, and OHS performance. To this end, it will train the corresponding personnel.

In matters related to occupational health and safety, the Client: i) is subject to annual external audits by an auditor accredited by the Ministry of Labor; and ii) will conduct monthly internal audits, as specified in its Occupational Health and Safety Plan.

Notwithstanding the above, ADN will develop and implement a procedure for managing the environmental and social performance of its contractors during the construction and operation phases, which will include targets and key performance indicators (“KPIs”). It will also prepare and regularly update the environmental and social (“E&S”) licenses and permits matrix for the execution of the Project.

4.1.h Stakeholder Engagement

As required by national legislation,¹⁰ ADN carried out a citizen participation process that included the population of the human settlements of San Pablo, Ladera del Cerro Cachito, Oasis, Félix Moreno, Defensores de la Patria and the Apurimac Homeowner’s Association. This included structured interviews and surveys, informative workshops, and publications in the press. In the face-to-face informative workshops, which were attended by a significant number of women, ADN presented a description of the Project, the environmental and social impacts it would generate, and the prevention and mitigation measures that will be implemented. These events recorded the main concerns of the settlements so that they could be addressed and considered in the environmental monitoring and control plans for the construction and operation phases of the Project.

Nevertheless, the Client will develop and implement a Project Stakeholder Engagement Plan (“SEP”) that includes: i) a summary of previous stakeholder engagement activities; ii) stakeholder mapping by level of influence; and iii) a description of future stakeholder engagement activities, including social investment programs.

4.1.h.i Disclosure of Information

The Client, complying with national legislation and following its internal procedures, socialized and communicated to the different stakeholders (municipal and provincial mayors, environmental activists, government representatives, public institutions, community associations, and society at large, among others) information regarding the possible environmental and social impacts that could be generated by the Project, as well as the control measures to be implemented to prevent or mitigate them.

¹⁰ Law No. 28611 - General Environmental Law, S.D. No 002-2009-MINAM - Regulation on transparency, access to public environmental information and citizen participation and consultation in environmental matters and MR No 027-2001-MITINCI/DM - Citizen Participation Guide for the Environmental Protection of the Manufacturing Industry.

4.1.i External Communication and Grievance Mechanisms

4.1.i.i External Communication

Under the Project's EMP, external communications with institutions and authorities such as the Municipality, the Ministry of the Environment, the OEFA, stakeholders, the Ministry of Production ("PRODUCE"), among others, are being handled by the Resident Construction Officer.

4.1.i.ii Grievance Mechanisms for Affected Communities

ADN currently receives concerns, complaints, claims, and suggestions ("CCCS") through direct telephone calls to the Community Relations Officer and through its web page.¹¹ Nevertheless, the Client will update its CCCS mechanism to include the following: i) a detail of the channels for receiving complaints and grievances;¹² 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 the results of the analysis of submitted and processed complaints; and v) a detail of how the mechanism will be disclosed to the ADSI and AISI communities and relevant stakeholders.

4.1.i.iii Ongoing Reporting to Affected Communities

ADN, in accordance with the level of concern and influence of the Project's ADSI and AISI communities, will provide regular reports to human settlements and other relevant stakeholders on its environmental and social performance, the implementation status of action plans to prevent risks or impacts to human settlements, and responses to complaints that have been received through its capture and processing mechanism.

4.2 Labor and Working Conditions

4.2.a Working Conditions and Management of Worker Relationships

The Client is currently developing its Internal Labor Regulations ("ILR") which will establish the guidelines that will regulate the relationship between employees and the Company.

The Project is committed to having at least 70% of its unskilled labor force be local. To date, the Company has 41 employees, of which 4 are its own personnel, 2 have been hired for supervisory purposes, and 35 work for contractors. Of the total, 3 are women and 13 are from the ADI. The Project is expected to require approximately 400 people (of which 80 are expected to be women) during the most demanding stage of construction and to generate approximately 2,000 direct jobs during the operation stage.

¹¹ <https://www.adnparquelogistico.com/sugerencias-y-reclamos>

¹² Including forms that allow anonymity, that are culturally appropriate, easy to access, free of charge to capture CCCS, and that guarantee no retaliation for those who submit them.

4.2.a.i Human Resources Policies and Procedures

The Client will develop, adopt, and disseminate among its direct workers and its contractors a Human Resources Policy which, among other issues, will include: i) the obligation to comply with national legislation on employment and labor issues; ii) the promotion of fair treatment, non-discrimination and equal opportunity for workers; iii) the protection of workers; iv) the promotion of a safe and healthy work environment, and the promotion of workers' health; v) zero tolerance for harassment and gender-based violence; and vi) the prohibition of forced labor.

4.2.a.ii Working Conditions and Terms of Employment

The Client will develop and disseminate its ILR among its own employees. These regulations will include general provisions for contractors, suppliers, and visitors. In addition, ADN will have employment contracts with its permanent and temporary employees that comply with the country's laws and standards.

4.2.a.iii Workers' Organizations

The Company, complying with the international conventions and treaties of the International Labor Organization ("ILO") relating to workers' rights and ratified by Peru, allows freedom of association and protects the rights of unionization, association, and collective bargaining. However, the Project does not currently have any labor unions.

4.2.a.iv Non-discrimination and Equal Opportunity

The Company, in its personnel selection policy, prohibits discrimination of any potential candidate by reason of political affiliation, ethnicity, race, language, gender, age or nationality, personal beliefs, sexual orientation, and union membership and, on the contrary, offers the opportunity to ADSI and AISI people in poverty or extreme poverty to be employed by the Project.

4.2.a.v Retrenchment

The Client and its contractors will enter into employment contracts with their personnel as provided for in the regulations in force for occasional, seasonal, or specific work or service.

4.2.a.vi Grievance Mechanism

Although, at present, each employee is free to submit any grievance to his or her direct manager, either by phone call or e-mail, ADN lacks a formal mechanism for capturing and processing internal grievances. The Client will therefore develop and implement an internal grievance mechanism open to all Project workers, including contractors, to include: (i) details of the channels for receiving complaints; (ii) a documentation system for recording, tracking, and analyzing complaints and solutions; (iii) defined timeframes and response records; (iv) 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.

4.2.b Protecting the Workforce

The ESDD found no evidence of child or forced labor practices. In any case, the Client will explicitly include the prohibition of child, forced, or unpaid labor in its ILR.

4.2.c Occupational Health and Safety

The Occupational Health and Safety and Environmental Management Plan ("OHS&E") applicable to contractors, suppliers, collaborators, among others, and the Client's Occupational Health and Safety Internal Regulations ("OHSIR") establish the OHS guidelines that all direct workers, contractors, suppliers, and visitors to the Project must comply with. In this sense, the Company has defined an OHS&E Goals and Targets Matrix that contains a series of tasks to achieve the OHS goals set.

The Client, as required by the regulations in force, has formed the Occupational Health and Safety Sub-Committee, which meets monthly and must actively participate in the Project's OHS management.

As part of its induction program for new personnel, the Company provides training on i) policies and procedures; ii) technical specifications of the operation; iii) health requirements to be observed (first aid, medical assistance); iv) first aid; v) communication of medical emergencies; vi) safety procedures; and vii) content of the contingency plan. Likewise, in accordance with the requirements of its training program, it gives talks on the following topics: i) basic use of personal protective equipment ("PPE"); ii) evacuation routes; iii) special work procedures; and iv) use of machinery for the maintenance of access roads, among others.

4.2.d Provisions for People with Disabilities

The Client will define specific provisions for both the construction and operation phases to ensure the full development of workers with disabilities who work on or visit the Project and will incorporate architectural elements in the design of the Project that allow for the free transit of persons with disabilities, even in emergency situations.

4.2.e Workers Engaged by Third Parties

The contracts entered into by the Client with its contractors include labor and human rights compliance clauses. Nevertheless, ADN will develop and implement: i) a contractor management plan, including measures to monitor compliance with its environmental, social, occupational health and safety, and labor policies, procedures and plans; and ii) a Contractor Code of Conduct.

4.2.f Supply Chain

The Human Resources Policy to be developed by the Client will also apply to all its suppliers.

4.3 Resource Efficiency and Pollution Prevention

4.3.a Resource Efficiency

From the design and planning phase, the Project has considered the generation of clean energy (solar energy) by installing solar panels in its facilities. Regarding the efficient use of water, during the operation phase, the Client will reuse domestic wastewater to irrigate green areas and flush toilets.

4.3.a.i Greenhouse Gases

The greenhouse gases to be generated during construction (for a period of about 10 months for each phase) will be mainly combustion gases (NO_x, SO₂, CO₂) from mobile (vehicles and heavy machinery) and stationary (electricity generators, generator sets, and forklifts sources). Nevertheless, the Client will conduct an annual GHG emissions inventory and implement a GHG emissions reduction plan for the construction and operation phases of the Project.

4.3.a.ii Water Consumption

Water for construction activities (6,000 m³/month) will be supplied by authorized companies using tanker trucks.

Following the Hydrogeological Study, the Project obtained a permit from the National Water Authority ("ANA") to draw groundwater from a tubular well for the Project's construction and operation phase. The water drawn from the well will be treated in a Reverse Osmosis Treatment Plant ("ROTP") that will generate 65% of the water for domestic consumption and the other 35% will be reject water, which will be infiltrated in a percolation area intended for this purpose. Water generated by the treatment plant for human consumption will be stored in a 260 m³ tank.

The Client will keep a control log of the volumes of water used for both construction and operation of the Project.

4.3.b Pollution Prevention

No material generation of liquid effluents is foreseen during construction, as there will be chemical toilets managed by a duly authorized company. During the operation stage, the domestic effluents generated (estimated at 200 m³/day) will be treated in a wastewater treatment plant ("WWTP") whose treated effluent, in compliance with the regulations in force,¹³ can be used either to irrigate green areas (approximately 30,000 m²) or to flush toilets and urinals.

As required by the environmental quality standards set forth in the regulations in force,¹⁴ the Project's monitoring and follow-up plan for its construction and operation phases provides for

¹³ Environmental Quality Standards of Supreme Decree No 004-2017- MINAM, Category 3: Irrigation of vegetables and animal drinking and will be reused for the irrigation system of green areas and/or gardens.

¹⁴ Regulations on National Environmental Quality Standards for Air - S.D. No 003-2017- MINAM; Regulations on National Environmental Quality Standards for Noise - S.D. No 085-2003- PCM.

monitoring air quality, environmental noise, and flora and fauna on a semi-annual and quarterly basis, respectively.

To mitigate environmental noise during construction, ADN will request vehicle inspection certificates, prohibit the use of sirens, and require compliance with the work schedule and monitoring program. For the operation phase, since the main source of noise is the movement of trucks entering and leaving the logistics park, the Client will request compliance with the equipment and machinery maintenance program.

The measures that ADN will take to prevent impacts on air quality include: i) the requirement of technical vehicle inspection certificates; ii) the maintenance of machinery and vehicle engines; iii) the wetting of access roads and work fronts; iv) the use of tarpaulin covers for loads; v) the watering of access roads and work fronts; vi) the delimitation of areas for the development of activities; and vii) the establishment of speed limits (40 km/h) in certain areas, among others. The preventive maintenance program for equipment and machinery will be observed during the operation stage.

4.3.b.i Waste

During the construction phase, the Project will generate non-hazardous solid waste (food scraps, disposable material) and waste from the construction process (soil, mixed aggregates, stones, concrete, bricks, glass, plastics, metal scraps, wood scraps, etc.), which will be taken to authorized landfills or sites designated by the Ventanilla District Municipality. To control waste generation, the Project has designed a Solid Waste Minimization and Management Plan.

Despite the above, the Client will monitor: i) the hazardous and non-hazardous solid waste generated and disposed of; ii) domestic effluents; and iii) the consumption of fuels, lubricants and oils.

4.3.b.ii Hazardous Materials Management

The chemical inputs to be used in the construction phase of the Project are basically standard admixtures for mixing concrete and cement plaster, paint, and diesel; there are no plans for intensive fuel storage. In the operation phase, the hazardous materials to be used mainly include chemical products for cleaning and maintenance of the facilities, which will be stored in plastic containers to prevent any spills.

Nevertheless, the Client will develop and implement 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 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.

4.4 Community Health, Safety and Security

4.4.a Community Health and Safety

The Client will develop and implement a Road Management and Safety Plan for the construction phase, that includes: i) the identification of potential risks associated with increased vehicular traffic during construction; ii) measures for the safe mobility of communities neighboring the road infrastructure; iii) protocols for monitoring and supervising vehicle routes, traffic in populated areas, frequency and schedules for moving loads, vehicle conditions, and drivers' health conditions; and iv) training requirements for drivers in defensive driving to avoid accidents.

4.4.a.i Infrastructure and Equipment Design and Safety

ADN's life and fire safety systems ("L&FS") have been designed to local regulations, are based on international industry best practices, and are aligned with the international standards of the National Fire Protection Association ("NFPA"). The Company has obtained permits and approval from the Ventanilla District Municipality for the design of the firefighting system for the entire logistics park.

4.4.b Security Personnel

At present, the Client has an external company contracted for the physical and property security of the Project, which has the respective permit granted by the competent authority.¹⁵ ADN conducts reasonable investigations to ensure that security personnel provided by this company do not have criminal records and have not been involved in cases of abuse in the past, and ensures that such personnel have received at least 60 hours of training in specific procedures regarding the progressive use of force, the use of firearms, human rights, and professional ethics. An additional filter that ADN has implemented is to check whether the proposed security personnel have ever been reported for domestic violence.

4.5 Cultural Heritage

The Project is not located in an area of archaeological interest.

5. Local Access of Project Documentation

The documentation relating to the project can be accessed at the following link: <https://www.adnparquelogistico.com/>

¹⁵ Superintendency of Security Services, SUCAMEC.