

VIVA Negocio Inmobiliario – PERU
Environmental and Social Action Plan (ESAP)

No.	Action	Deliverable	Delivery date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts			
1.1	E&S Assessment and Management System		
1.1.1	Update the corporate Environmental and Social Management System (“ESMS”) to include: i) policy; 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.	Updated corporate ESMS documents.	365 days after signing the loan agreement.
1.1.2	Implement the ESMS in all current and future projects.	Evidence of implementation of the ESMS in all projects.	180 days after signing the loan agreement for current projects and then as part of the Environmental and Social Compliance Report (ESCR).
1.1.3	Disseminate the ESMS to direct employees, contractors, subcontractors, and suppliers.	Evidence of dissemination of the ESMS to contractors, subcontractors, and suppliers.	365 days after signing the loan agreement.
1.2	Policy		
1.2.1	Update the Risk Prevention and Environment Policy in accordance with international best practices.	Updated Environmental and Social Policy.	90 days after signing the loan agreement.
1.2.2	Disseminate the updated Environmental and Social Policy to direct and indirect employees.	Evidence of dissemination.	Periodically in the ESCR.
1.3	Identification of Risks and Impacts		
1.3.1	Develop corporate procedures to identify hazards, assess risks and impacts, and determine controls on all activities, processes, and facilities.	Procedures to identify hazards, assess risks and impacts, and determine controls.	180 days after signing the loan agreement.
1.3.2	Implementation of procedures to identify hazards, assess risks and impacts, and determine controls on all current and future projects.	Proof of Implementation of the procedures.	180 days after signing the loan agreement for current projects and then as part of the ESCR.
1.3.3	Develop a stakeholder consultation procedure to identify risks prior to initiating a new project, based on their classification.	Stakeholder consultation procedure.	180 days after signing the loan agreement.
1.3.4	Implementation of stakeholder consultation procedure.	Proof of Implementation.	Periodically in the ESCR.
1.3.5	Develop a corporate procedure to identify and assess gender risks based on the IDB Invest Gender Risk Assessment Tool (“GRAT”) to apply to each business unit, which includes: i) an assessment of occupational health and safety (“OHS”) risks; ii) mapping of areas that may be susceptible to sexual exploitation of women and children within the Project’s area of influence; and iii) an analysis of the impacts that the presence of Project employees may generate with regard to gender issues.	Procedure to identify and assess gender risks.	365 days after signing the loan agreement.
1.3.6	Adopt the Gender Risk Identification and Assessment Procedure.	Proof of adoption.	Periodically in the ESCR.
1.3.7	Conduct a periodic analysis of performance indicators associated with the Integrated Management System (“IMS”).	Analysis of performance indicators.	Periodically in the ESCR.
1.3.8	Incorporation of measures to manage or prevent the effects of climate change in project design.	Fondo MIVIVIENDA certification, green bond including a bioclimate parameter, or certification by an independent engineer on the incorporation of	Prior to initiating each new project.

		measures to manage the effects of climate change in project design.	
1.4	Management Programs		
1.4.1	Develop a corporate Comprehensive Solid and Liquid Waste Management Procedure.	Waste Management Procedure.	90 days after the first disbursement.
1.4.2	Implement the procedure.	Proof of adoption.	Periodically in the ESCR.
1.4.3	Develop a corporate Air Quality Management Procedure (e.g.: all types of emissions, particulate matter, environmental noise).	Air Quality Management Procedure.	90 days after the first disbursement.
1.4.4	Implement the procedure.	Proof of adoption.	Periodically in the ESCR.
1.4.5	Develop a Hazardous Materials Management Procedure.	Hazardous Materials Management Procedure.	90 days after the first disbursement.
1.4.6	Implement the procedure.	Proof of adoption.	Periodically in the ESCR.
1.4.7	Develop a procedure for the provision and maintenance of employee accommodation which is applicable to current and future projects.	Procedure for the provision and maintenance of employee accommodation.	90 days after the first disbursement.
1.4.8	Implement the procedure.	Proof of adoption.	Periodically in the ESCR.
1.4.9	Update the Contractor or Service Provider Responsibilities Standard Procedure to ensure that contractors and critical service providers: i) respect employees' legal rights with regard to salary payments, working hours, overtime; and ii) adopt VIVA's ESMS programs.	Updated contractor and supplier management procedure.	90 days after the first disbursement.
1.4.10	Develop a road safety procedure which includes roadside emergency preparedness and response plans and emergency assistance for drivers and third parties for all current and future projects, within and in areas adjacent to works.	Transport Management Procedure.	180 days after the first disbursement.
1.4.11	Adopt the procedure.	Proof of adoption.	Periodically in the ESCR.
1.5	Organizational Capacity and Competency		
1.5.1	Appoint a person responsible (reporting directly to the CEO) for implementing the Company's Environmental and Social Management System ("ESMS"), who must oversee implementation and monitoring of all environmental, social, and health and safety management plans, programs, and procedures, including implementation by contractors and suppliers.	Appointment of the person responsible for implementing the ESMS.	On the date of the first disbursement.
1.5.2	Appoint a person responsible for managing corporate OHS risks, reporting directly to the ESMS supervisor.	Appointment of the person responsible for OHS.	90 days after the first disbursement.
1.6	Emergency Preparedness and Response		
1.6.1	Produce a reference framework for the Emergency Preparedness and Response Plan ("EPRP") for each new project which identifies all likely emergency situations and determines the appropriate response in each case.	Reference framework for the preparation of an EPRP.	180 days after the first disbursement.
1.6.2	Implement the EPRP Procedure in all the Company's current and future projects.	Proof of Implementation.	180 days after signing the loan agreement for current projects and then periodically in the ESCR.
1.7	Monitoring and Review		
1.7.1	Develop a procedure to monitor, oversee, and assess the implementation of the Company's Environmental and Social Management System ("ESMS") which includes: i) environmental and social ("E&S") key performance indicators; ii) internal and external environmental audit procedures; iii) implementation methods for action plans derived from internal and external audits; iv) monitoring procedures for the most severe operational risks; v) requirements for reporting ESMS performance to management; and vi) community, supplier, and contractor management monitoring and assessment activities.	ESMS Monitoring and Oversight Procedure.	365 days after the first disbursement.
1.7.2	Implement the ESMS Monitoring and Oversight Procedure on current and future projects.	Proof of Implementation.	Periodically in the ESCR.
1.8	Stakeholder Engagement		

1.8.1	Develop a corporate Stakeholder Participation Procedure which includes: i) stakeholder mapping; ii) stakeholder analysis; iii) stakeholder participation methods; iv) details of how to record stakeholder communications; and vi) the means and frequency of communication with the community.	Stakeholder Participation Procedure.	270 days after signing the loan agreement.
1.8.2	Implement the Stakeholder Participation Procedure.	Proof of Implementation.	Periodically in the ESCR.
1.9	External Communication and Grievance Mechanisms		
1.9.1	Produce an External Grievance Mechanism which includes: i) grievance receipt methods; ii) a documentation system for recording, monitoring, and analyzing grievances and solutions; iii) grievance response methods; iv) external stakeholder communication and dissemination mechanisms; v) a review by senior management to assess the system's effectiveness; vi) inclusion of grievances and resolutions in public reports; vii) the means of extending the procedure to suppliers; viii) key stakeholder participation methods for receiving and managing grievances; and ix) training to be provided on applying the procedure.	External Grievance Mechanism.	270 days after signing the loan agreement.
1.9.2	Adopt the grievance mechanism.	Report on the mechanism's operation.	Periodically in the ESCR.
1.9.3	Update the communities on the status of undertaken commitments.	Minutes of meetings held, or evidence of informational material provided to the community.	Periodically in the ESCR.
1.9.4	Notify communities whenever there is a material change in operations or when implementing a new process that may generate unintended impacts for them.	Minutes of meetings held, or evidence of informational material provided to the community.	Periodically in the ESCR.
PS 2: Labor and Working Conditions			
2.1	Human Resources Policies and Procedures		
2.1.1	Develop a Human Resources Policy appropriate for the size of its workforce—including direct employees, indirect employees, and suppliers—in accordance with the provisions of Peruvian legislation and ILO international conventions.	Human Resources Policy.	90 days after signing the loan agreement.
2.1.2	Adopt the policy.	Proof of adoption.	Periodically in the ESCR.
2.2	Internal Grievance Mechanism		
2.2.1	Implement a training program on the use of the existing internal grievance mechanism for direct and indirect employees.	Evidence of the Grievance Mechanism Use Training Program.	Periodically in the ESCR.
2.2.2	Generate statistics on the use of the internal grievance mechanism.	Proof of Implementation.	Periodically in the ESCR.
2.3	Occupational Health and Safety		
2.3.1	Conduct a gap analysis on the Company's OHS management system, together with a corrective action plan and a schedule for its implementation, which prioritizes ESMS procedures that must be developed or updated in critical areas to prevent common accidents, using international standards (e.g., ISO 45001) as a benchmark.	Gap analysis and corrective action plan.	180 days after signing the loan agreement.
2.3.2	Develop OHS procedures, manuals, and instructions, as indicated in the corrective action plan.	OHS procedures.	In accordance with the dates indicated in the corrective action plan.
2.3.3	Implement OHS procedures in all current and future projects.	Proof of Implementation.	Periodically in the ESCR.
2.4	Supply Chain		
2.4.1	Develop an Environmental and Social "E&S" Management Policy for Critical Suppliers.	Supplier Policy.	90 days after signing the loan agreement.
2.4.2	Implement the Supplier E&S Management Policy.	Proof of Implementation of the policy.	Periodically in the ESCR.
2.4.3	Develop a Supplier E&S Management Procedure which includes: i) supplier categorization; ii) the identification and management of risks and impacts of its main suppliers; iii) a training plan to help manage	Procedure to identify, assess, and monitor E&S issues in the supply chain.	365 days after signing the loan agreement.

	environmental and social issues; iv) performance monitoring for the review of the procurement policy; and v) the design of E&S capability development programs for suppliers.		
2.4.4	Implement the Supplier E&S Management Procedure.	Proof of Implementation.	Periodically in the ESCR.
PS 3: Resource Efficiency and Pollution Prevention			
3.1	Resource Efficiency		
3.1.1	Conduct an annual greenhouse gas (“GHG”) emissions inventory for all the Company’s activities, processes, and facilities, and issue periodic reports.	Annual GHG emissions inventory.	Periodically in the ESCR.
3.1.2	Monitor energy and water consumption during the construction phase of current and future projects.	Monitor energy consumption for current and future projects.	365 days after signing the loan agreement.
3.1.3	Incorporate energy efficiency and water use standards in the construction phase of current and future projects through monitoring of energy and water consumption.	Evidence of the incorporation of energy efficiency and water use standards.	Periodically in the ESCR.
3.2	Pesticide Use and Management		
3.2.1	Develop an Integrated Pest Control (“IPC”) or Integrated Vector Control (“IVC”) Procedure, which must not include the use of pesticides that are classified as “Ia” (extremely hazardous) or “Ib” (highly hazardous) by the World Health Organization.	Integrated Pest Control (“IPC”) or Integrated Vector Control (“IVC”) Procedure.	180 days after signing the loan agreement.
3.2.2	Implement the procedure.	Proof of adoption.	Periodically in the ESCR.
PS 4: Community Health, Safety, and Security			
4.1	Emergency Preparedness and Response		
4.1.1	Develop a specific Emergency Preparedness and Response Procedure for the Project which includes emergency prevention and response activities for VIVA and its contractors, visitors, and communities.	Emergency Preparedness and Response Procedure for the Project.	At least 30 days prior to initiating construction of the new Project.
4.1.2	Adopt the procedure.	Proof of adoption.	Periodically in the ESCR.
4.2	Security Personnel		
4.2.1	Produce a Security Management Manual which includes information on professional ethics and human rights and incorporates the United Nations’ Voluntary Principles on Security and Human Rights.	Security Management Manual.	270 days after signing the loan agreement.
4.2.2	Implement the Security Management Manual.	Implementation reports.	Periodically in the ESCR.
4.2.3	Provide training to security personnel on human rights issues in accordance with the International Finance Corporation’s “Good Practice Handbook: Use of Security Forces: Assessing and Managing Risks and Impacts, Guidance for the Private Sector in Emerging Markets.”	Evidence of the training provided to security personnel.	Periodically in the ESCR.
PS 5: Land Acquisition and Involuntary Resettlement			
5.1	Land Acquisition and Involuntary Resettlement		
5.1.1	Develop a corporate procedure to ensure that land acquisition for new projects does not generate physical or economic displacement of the population.	Land Acquisition Procedure.	180 days after the first disbursement or 30 days prior to initiation of a new project.
5.1.2	Implement the Land Acquisition Procedure.	Proof of Implementation.	Periodically in the ESCR.
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources			
6.1	Biodiversity Conservation and Sustainable Management of Living Natural Resources		
6.1.1	Develop a corporate procedure (compulsory for contractors and subcontractors) to protect biodiversity at the sites where future real estate projects will be developed.	Biodiversity Protection Procedure.	180 days after the first disbursement or 30 days prior to initiation of a new project.
6.1.2	Implement the Biodiversity Protection Procedure.	Proof of Implementation.	Periodically in the ESCR.
PS 7 Indigenous Peoples			
7.1	Avoidance of Adverse Impacts		

7.1.1	Develop a Social and Environmental Risks and Impacts Assessment Procedure that is applicable to Indigenous communities within the direct area of influence of future projects.	Social and Environmental Risks and Impacts Assessment Procedure that is applicable to Indigenous communities.	180 days after the first disbursement or 30 days prior to initiation of a new project.
7.1.2	Implement the Social and Environmental Risks and Impacts Assessment Procedure for Indigenous Communities (where applicable).	Proof of Implementation.	Periodically in the ESCR.
PS 8: Cultural Heritage			
8.1	Cultural Heritage		
8.1.1	Develop a corporate procedure (compulsory for contractors and subcontractors) to manage chance finds.	Chance Find Procedure.	180 days after the first disbursement or 30 days prior to initiation of a new project.
8.1.2	Implement the Chance Find Procedure (where applicable).	Proof of Implementation.	Periodically in the ESCR.