

**Environmental and Social Action Plan (ESAP)  
Marinasol – PERU**

No.	Reference	Measure	Final product/deliverable	Anticipated Completion Date
<b>PS 1: Assessment and Management of Environmental and Social Risks</b>				
1.1	Environmental Management System (“EMS”)	<p>1. Continue developing a specific Integrated Management System (IMS) for Marinasol’s operations, including: (i) the existing IMS integrated policy and global occupational health and safety (OHS) policy; (ii) internal procedures to identify, assess, and manage possible environmental, social, and health and OHS risks and impacts associated with each Project activity, both for their own workers and those engaged by third parties (contractors and subcontractors); (iii) internal procedures to ensure compliance with the Environmental Management Plan (EMP); (iv) required organizational capacities and competencies, including the definition of roles and allocation of responsibilities for the implementation of such IMS; (v) emergency preparedness and response protocols; (vi) stakeholder engagement plans; (vii) external communication and grievance mechanism; (viii) protocols for the disclosure of information, decision making and training to communities; (ix) protocols for the evaluation and continuous improvement of the IMS, and (x) regular audits and inspections of E&amp;S and OHS requirements under the Peruvian environmental regulations.</p> <p>2. Implement the IMS.</p>	<p>1. Copy of the IMS proposed specifically for Marinasol.</p> <p>2. Evidence of IMS implementation.</p>	<p>1. 180 days after signing the loan agreement.</p> <p>2. As from 30 days after IMS implementation, in each Environmental and Social Compliance Report (ESCR).</p>

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		3. Evaluate the IMS implementation based on the Manual and the Implementation Tools concerning IFC environmental management systems <sup>1</sup> .	3. IMS assessment report.	3. 120 days after IMS implementation date.
1.2	Direct and indirect impacts and risks	1. Develop a procedure for the identification and assessment of environmental and social (E&S) impacts and risks and their control measures, both in relation to the Company's operations and its supply chain, the purpose of which should be to monitor operations and activities, and determine, prevent and control those having or potentially having significant impacts on the environment or material risks associated with OHS and the protection of shrimp, infrastructure and equipment.	1. Copy of the E&S impacts and risks identification and assessment procedure and their control measures.	1. 120 days after signing the loan agreement.
		2. Adopt the procedure.	2. Evidence of procedure implementation.	2. In each ESCR.
1.3	Emergency Preparedness and Response	1. Prepare an induction program on OHS and environmental emergency matters for all staff hired by third parties, customers, suppliers and visitors coming to the Company's premises or production units.	1. Copy of the induction program on OHS and environmental emergency matters.	1. 60 days after signing the loan agreement.
		2. Adopt the induction program.	2. Evidence of program implementation.	2. In each ESCR.
1.4	Crisis Management	1. Prepare a crisis management program including measures to address and manage E&S crises in the Project's area of influence, with the following goals: i) identifying a crisis; ii) controlling and mitigating as soon as possible and in a proper	1. Copy of the crisis management program for Marinasol.	1. 120 days after signing the loan agreement.

<sup>1</sup> Social and Environmental Management System, Implementation Manual – General, IFC, version 2.1, November 2015. Social and Environmental Management System tools – General, IFC, version 1.2, November 2015.

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		<p>manner the occurrence or imminence of the impacts or damages caused by the crisis; iii) safeguarding assets in accordance with the order of priority set, for instance: a) the integrity of Marinasol's staff, contractors or subcontractors, b) the environment (resources, water, air and land), and c) the facilities of each production unit; iv) proposing and adopting measures to resume dialogue.</p>		
		2. Adopt the crisis management program.	2. Evidence of program implementation.	2. In each ESCR.
1.5	Project Compliance with Applicable Standards	1. Submit a consolidated annual report on the degree of compliance with: i) the progress of IMS actions in relation to the key performance indicators (KPI) set, and ii) the degree of compliance with IDB Invest's Environmental and Social Sustainability Policy.	1. Environmental and Social Compliance Report (ESCR).	1. Annually over the life of the loan.
1.6	Stakeholder Engagement	1. Develop a Community Engagement Plan (CEP) setting the strategies for effective communication and good relations with population and stakeholders within the Project's area of influence, establishing protocols for: i) interviews with authorities and stakeholders' representatives; ii) periodic informative meetings with stakeholders, and iii) social media and network management.	1. Copy of CEP for Marinasol.	1. 120 days after signing the loan agreement.
		2. Implement the CEP.	2. Evidence of plan implementation.	2. In each ESCR.
1.7	External Communications	1. Prepare a Global Corporate Communication Policy ensuring that all communications, whether directed to internal or external audiences, are delivered in a careful, responsible, and efficient manner.	1. Copy of the Corporate Communication Policy.	1. 120 days after signing the loan agreement.
1.8	External Grievance Mechanism	1. Develop a Methodological Guide for Community Grievances and Suggestions to address and follow-up the grievances and suggestions filed by external people or organizations, which should: i) appoint a person in charge of relations with the local	1. Copy of the Methodological Guide for Community	1. 180 days after signing the loan agreement.

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		community, who will address and follow-up the grievances and suggestions, and report the semiannual performance indicators; ii) establish a methodology to determine how the grievance is received, classified, assessed, investigated and resolved, the method used for follow-up and closing and how the IMS will be adapted or improved in terms of communication and reporting, and iii) determine the communication channels to receive grievances and suggestions from neighboring people and organizations.	Grievances and Suggestions.	
		2. Adopt the methodological guide.	2. Evidence of plan implementation.	2. In each ESCR.
<b>PS 2: Labor and Working Conditions</b>				
2.1	Internal Grievance Mechanism	1. Update the method through a Grievance Procedure that: i) documents the internal reports or grievances of its employees, contractors and subcontractors, specifying how they are recorded, investigated or evaluated and the process for follow-up, closing or resolution thereof; ii) provides a culturally appropriate system that is easily accessible at any time (for instance, an inbox or an external mailbox with printed or digital forms to record reports, grievances or inquiries); iii) accepts anonymous grievances, respects confidentiality and provides protection to reporting employees against retaliation, and iv) does not prevent, or more accurately, provides access to other applicable legal or administrative remedies, justified by the severity of the violation, according to national labor legislation or regulations.	1. Copy of the grievance procedure.	1. 90 days after signing the loan agreement.
		2. Adopt the updated procedure.	2. Evidence of procedure implementation.	2. In each ESCR.
2.2	Workers Engaged by Third Parties	1. Develop a Policy for Outsourced Staff Contracting and Service Provision observing national labor legislation (including ratified ILO conventions) and allowing to: i) ensure that its contractors	1. Copy of the policy.	1. 120 days after signing the loan agreement.

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		are legitimate companies; ii) ensure that outsourced workers are contracted and dismissed in accordance with local legislation (including the ILO conventions ratified by Peru), especially those referring to the prohibition to use child or forced labor; iii) follow-up on the performance of these third-party employers through commercially reasonable measures incorporated into contractual agreements, and iv) ensure that the workers contracted by third parties have access to the grievance mechanism, either the contractor's or Marinasol's.		
		2. Establish a training program on the Policy for Outsourced Staff Contracting and Service Provision to be implemented and communicated to all directors and the staff contracting Marinasol's external services.	2. Copy of the policy training program.	2. 120 days after signing the loan agreement.
2.3	Supply Chain	1. Develop a Sustainable Procurement Policy to regulate the purchase of assets (materials, equipment, etc.) and service contracting, demanding suppliers to comply with applicable labor regulations (specifically, child and forced labor prohibitions, without incorporating to its business activity any product or service using them), as well as OHS and environmental protection requirements.	1. Copy of the policy.	1. 120 days after signing the loan agreement.
		2. Implement the Sustainable Procurement Policy.	2. Evidence of policy implementation.	2. In each ESCR.
<b>PS 3: Resource Efficiency and Pollution Prevention</b>				
3.1	Greenhouse Gases (GHG)	1. Prepare an annual GHG emission inventory count during Project operations to quantify both direct emissions from fuel consumption (scope 1) and indirect emissions from the use of electric power (scope 2).	1. Annual GHG emission inventory count during Project operations.	1. In each ESCR.
3.2	Water Consumption	1. Develop a Water Consumption Reduction and Awareness Program for Project operation and maintenance (O&M), including: i) monitoring the monthly water consumption, and ii) a procedure to take action and correct the causes for excessive consumption.	1. Copy of the Project's Water Consumption Reduction and	1. 90 days after signing the loan agreement.

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			Awareness Program.	
		2. Implement the awareness program.	2. Evidence of program implementation.	2. In each ESCR.
3.3	Energy Efficiency	1. Develop an Energy Efficiency Program to: i) identify the measures to reduce the use of fuels and electricity; ii) analyze alternatives for the use of renewable energy sources, and iii) evaluate whether it is feasible to implement the energy saving measures on an overall basis.	1. Copy of the Project's Energy Efficiency Program.	1. 30 days prior to the start of Project operations, as per the schedule for new fields reactivation.
		2. Implement the Energy Efficiency Program.	2. Evidence of program implementation.	2. In each ESCR.
<b>PS 4: Community Health, Safety and Security</b>				
4.1	Community Health, Safety and Security	1. Include as part of the integral service contracts for the expansion of Project operations specific clauses to address all types of losses and redress all damages caused to the assets of the State, an individual or the community in general within the area of influence of any Project.	1. Copy of the integral service contracts for the new Project infrastructures.	1. 15 days prior to Project expansion.
4.2	Fire Protection System	2. Obtain from a qualified professional a certificate showing that: i) all Project facilities and buildings were built in accordance with approved life and fire safety system (L&FS) designs; ii) all equipment units have been installed according to the L&FS design, and iii) all L&FS equipment units have been tested following national and international requirements.	2. Copy of the L&FS certificate for any new Project facility.	2. 15 days prior to the start of operations of any new Project facility.
4.3	Refrigeration Systems	1. Carry out a security evaluation of the ammonia refrigeration systems in each processing and freezing plant, including detection mechanisms, alarm systems and resources to fight and control leaks, and comparing the results against applicable	1. Copy of results of the security evaluation of refrigeration	1. 120 days after signing the loan agreement.

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		local regulatory and international standards, such as those of the International Institute of Ammonia Refrigeration (IIAR).	systems in each processing and freezing plant.	
		2. Based on the results of the security evaluation, develop a Corrective Action Plan (CAP) addressing the gaps to be implemented to guarantee ammonia management and security in compliance with national regulatory limits, the World Bank's General Environmental, Health, and Safety Guidelines and IIAR standards.	2. Copy of the Corrective Action Plan based on the results of the security evaluation in each plant.	2. 30 days after obtaining the results of the security evaluation.
		3. Update the OHS Management System's Training Plan, specifically in terms of emergency preparedness and response in the event of ammonia leaks, including the performance of scheduled drills involving the participation of neighboring communities and emergency response sector authorities.	3. Copy of the updated OHS Management System's Training Plan.	3. 30 days after obtaining the results of the security evaluation.
4.4	External Security Policy and Protocols	1. Ensure that the contracts of the security and surveillance personnel provider include the Company's right to: i) carry out reasonable investigations to ensure that security personnel have no criminal records and have not been involved in any case of abuse in the past; ii) verify the details of required training regarding use of force; iii) verify the restrictions in the use of firearms; and iv) identify the details of training in environmental awareness.	1. Copy of the contracts between STI and each security company.	1. 90 days after signing the loan agreement.