

**Deprati – ECUADOR**  
**Environmental and Social Action Plan (ESAP)**

No.	Aspect	Action	Deliverable	Delivery date
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>				
1.1	Assessment and Management of Environmental and Social Risks and Impacts	1. Develop a Corporate Environmental and Social Management System (“ESMS”).	1. ESMS documents.	1. 18 months after signing the loan agreement.
		2. Implement the ESMS.	2. Evidence of implementation.	2. As part of the Environmental and Social Compliance Report (ESCR).
1.2	Policy	1. Update the Occupational Health and Safety (OHS) Policy to define E&S objectives and principles aimed at achieving good E&S performance in its operations.	1. Updated policy.	1. No later than 365 days after signing the loan agreement.
		2. Disseminate the updated OHS Policy to both direct and indirect workers (contractors and suppliers), and affected communities.	2. Evidence of dissemination.	2. No later than 365 days after signing the loan agreement.
1.3	Identification of Risks and Impacts	1. Develop for the DC, commercial premises, and the headquarters office, a community environmental risks and impacts identification and assessment procedure.	1. Environmental and Social Risks and Impacts Identification and Assessment Procedure.	1. No later than 300 days after signing the loan agreement.
		2. Prepare an Environmental Risks Matrix for the new DC.	2. Environmental Risks and Impacts Identification and Assessment Matrix for the DC.	2. 30 days prior to the start of operation.
		3. Prepare an Environmental Risks Matrix for each commercial premise.	3. Environmental Risks and Impacts Identification and Assessment Matrix for each commercial premise.	3. 18 months after signing the loan agreement.
		4. Prepare a Social Risks Matrix for the new DC.	4. Social Risks and Impacts Identification and Assessment Matrix for the DC.	4. 30 days prior to the start of operation.
		5. Prepare a Social Risks Matrix for each commercial premise.	5. Social Risks and Impacts Identification and Assessment Matrix for each commercial premise	5. 18 months after signing the loan agreement.
		6. Update the HIRA Matrix per activity and job position in order to assess residual risk.	6. Updated OHS HIRA Matrix.	6. No later than 365 days after signing the loan agreement.
1.4	Gender Risks	1. Develop a Human Rights and Gender-Based Harassment and Violence Prevention Policy.	1. Human Rights and Gender-Based Harassment and Violence Prevention Policy.	1. No later than 365 days after signing the loan agreement.
		2. Disclose the Human Rights and Gender-Based Harassment and Violence Prevention Policy.	2. Evidence of disclosure.	2. No later than 365 days after signing the loan agreement.
		3. Disseminate the Equality Plan to direct workers at the corporate level.	3. Evidence of dissemination.	3. No later than 180 days after signing the loan agreement.
		4. Conduct a gender risk assessment at the new and existing DCs, headquarters, and commercial premises.	4. Gender Risks Identification Matrix.	4. No later than 180 days after signing the loan agreement.
		5. Implement the Equality Plan at the corporate level.	5. Evidence of implementation.	5. Periodically as part of the ESCR.
1.5	Climate Change Exposure	1. Include in the environmental risk matrix for the new DC (a) the most pertinent climate risks identified; and (b) the relevant mitigation measures.	1. Environmental Risks Matrix for the new DC.	1. 30 days prior to the start of operation.
		2. Include in the existing environmental risk matrix for the DC and commercial premises (a) the most pertinent climate risks identified; and (b) the relevant mitigation measures.	2. Environmental Risks Matrix for the existing DC and headquarters.	2. No later than 365 days after signing the loan agreement.
1.6	Management Programs	1. Develop a Corporate Environmental Monitoring and Follow-up Program.	1. Environmental Monitoring and Tracking Program.	1. No later than 365 days after signing the loan agreement.
		2. Implement the Environmental Monitoring and Follow-up Program.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Develop a Corporate Integrated Solid and Liquid Waste Management Program.	3. Integrated Solid and Liquid Waste Management Program.	3. No later than 300 days after signing the loan agreement.

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		4. Implement the Integrated Solid and Liquid Waste Management Program.	4. Evidence of implementation.	4. As part of the ESCR.
1.7	Organizational Capacity and Competency	1. Appoint an E&S management officer at the corporate level.	1. Copy of the appointment.	1. No later than 365 days after signing the loan agreement.
		2. appoint a leader responsible for the development, implementation, and monitoring of social management.	2. Copy of the appointment.	2. No later than 365 days after signing the loan agreement.
		3. Update the organizational chart to define communication channels for operations at the national level.	3. Updated organizational chart.	3. No later than 365 days after signing the loan agreement.
		4. Provide periodic training for its direct and indirect personnel (contractors and subcontractors) on the functioning of the ESMS.	4. Evidence of training.	3. As part of the ESCR.
1.8	Emergency Preparedness and Response	1. Develop an Emergency Preparedness and Response Plan (EPRP) for the new DC, to include, among others, the most relevant climatic risks to its operations.	1. Emergency Plan for the new DC.	1. 30 days prior to the start of operation.
		2. Disseminate the updated EPRP for the DC.	2. Evidence of dissemination.	2. As part of the ESCR.
		3. Create a dissemination schedule for the EPRPs for commercial premises at the national level.	3. Dissemination schedule for each commercial premise.	3. No later than 365 days after signing the loan agreement.
		4. Disseminate the EPRPs to direct staff.	4. Evidence of dissemination.	4. As part of the ESCR.
1.9	Monitoring and review	1. Develop a procedure to evaluate the management of its ESMS, which will include KPIs.	1. Procedure to evaluate the management of its ESMS.	1. 18 months after signing the loan agreement.
		2. Develop an internal or external audit schedule to assess the performance of the ESMS.	2. Internal or external audit schedule.	2. 18 months after signing the loan agreement.
		3. Implement the Internal or external audit schedule.	3. Evidence of implementation.	3. As part of the ESCR.
		4. Develop a matrix of legal and contractual environmental requirements.	4. Matrix of legal and contractual environmental requirements.	4. No later than 365 days after signing the loan agreement.
		5. Keep the matrix of legal and contractual environmental requirements up to date.	5. Updated matrix of legal and contractual environmental requirements.	5. As part of the ESCR.
1.10	Stakeholder Engagement	1. Develop a Stakeholder Engagement Procedure (SEP) tailored to the scope and magnitude of the social impact of its operations.	1. Stakeholder Engagement Procedure.	1. 18 months after signing the loan agreement.
		2. Implement the SEP.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Conduct a consultation and informed participation workshop (CPI) with stakeholders of the new DC.	3. Evidence of implementation.	3. 30 days prior to the start of operation.
1.11	Disclosure of Information	1. Develop a schedule for disclosing information related to the Company's E&S performance.	1. Schedule for disclosing information.	1. 18 months after signing the loan agreement.
		2. Implement the schedule for disclosing information.	2. Evidence of implementation.	2. As part of the ESCR.
1.12	Community Grievance Mechanism	1. Develop an external grievance mechanism.	1. External Grievance Mechanism.	1. No later than 365 days after signing the loan agreement.
		2. Disseminate the external grievances mechanism to relevant stakeholders according to the stakeholder mapping.	2. Evidence of disclosure.	2. No later than 365 days after signing the loan agreement and then as part of the ESCR.
<b>PS 2: Labor and Working Conditions</b>				
2.1	Working Conditions and Management of Worker Relationships	1. Develop a corporate human resources policy.	1. Human resources policy.	1. No later than 365 days after signing the loan agreement.
		2. Disseminate the corporate human resources policy.	2. Evidence of dissemination.	2. As part of the ESCR.
		3. Develop an inspection program for the food service, including monitoring the quality of potable water.	3. Inspection program for the food service.	3. No later than 300 days after signing the loan agreement.
		4. Implement the inspection program for the food service.	4. Evidence of implementation.	4. As part of the ESCR.

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2.2	Non-discrimination and Equal Opportunity	1. Update the Recruitment and Selection Procedure to incorporate criteria of equity, and a zero-tolerance stance against harassment and discrimination.	1. Updated Recruitment and Selection Procedure.	1. No later than 365 days after signing the loan agreement.
2.3	Grievance Mechanism	1. Update the Internal Grievance Mechanism para: i) incorporate other culturally appropriate and easily accessible channels; ii) allow for the submission of additional workplace concerns; iii) incorporate a system for recording, classifying, and tracking grievances; iv) define response times commensurate with the severity of the grievance; v) scribe the evaluation and improvement processes for the mechanism; vi) specify communication and disclosure methods; vii) allow for anonymity; and viii) ensure zero tolerance for retaliation against users.	1. Updated Internal Grievance Mechanism.	1. No later than 300 days after signing the loan agreement.
		2. Disseminate the updated internal grievances mechanism to direct staff, indirect staff, and contractors.	2. Evidence of dissemination.	2. As part of the ESCR.
2.4	Occupational Health and Safety	1. Update the Occupational Health, Safety, and Environmental Management System (OHSEMS) Manual to align with current regulatory changes.	1. Updated OHSEMS Manual.	1. No later than 365 days after signing the loan agreement.
		2. Implement the updated OHSEMS Manual.	2. Evidence of compliance.	2. As part of the ESCR.
		3. Disseminate the updated OHSEMS Manual to direct and indirect staff (contractors and subcontractors).	3. Evidence of dissemination.	3. As part of the ESCR.
		4. Develop an OHS Plan for the new DC.	4. OHS Plan for the new DC.	4. 30 days prior to the start of operation.
		5. Implement the OHS Plan for the new DC.	5. Evidence of implementation.	5. As part of the ESCR.
		6. Conduct a comprehensive OHS risk management assessment.	6. Assessment Report.	6. No later than 365 days after signing the loan agreement.
		7. Implement the corrective measures from the comprehensive evaluation report.	7. Evidence of implementation.	7. When applicable.
		8. Implement the corrective actions and recommendations from industrial hygiene assessments.	8. Evidence of implementation.	8. As part of the ESCR.
2.5	Workers Engaged by Third Parties	1. Develop a Contractor and Service Provider Management Plan that includes measures to monitor their legal compliance and adherence to labor, OHS, and environmental policies, procedures, and plans of De Prati.	1. Contractor Management Plan.	1. No later than 365 days after signing the loan agreement.
		2. Implement the Contractor and Service Provider Management Plan.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Develop a training program for indirect workers, including topics related to (a) the OHS Policy; and (b) the prevention of gender-based violence (GBV), discrimination, and the rights of women and vulnerable groups.	3. Training program for indirect workers.	3. No later than 365 days after signing the loan agreement.
		4. Implement the training program for indirect workers.	4. Evidence of implementation.	4. As part of the ESCR.
2.6	Supply Chain	1. Update the procedures for selecting suppliers to include, among other aspects, the prohibition of forced and child labor.	1. Updated procedures for selecting suppliers.	1. No later than 365 days after signing the loan agreement.
		2. Implement the procedures for selecting suppliers.	2. Evidence of implementation.	2. As part of the ESCR.
<b>PS 3: Resource Efficiency and Pollution Prevention</b>				
3.1	Greenhouse Gases	7. Conduct a greenhouse gas ("GHG") emissions inventory including scopes 1, 2, and 3 for its new and existing DCs, administrative offices, and commercial premises.	1. GHG Emissions Inventory.	1. Upon completion of the second year following the signing of the

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		1. Maintain an annual record of GHG emissions including scopes 1, 2, and 3.	2. Annually update the GHG emissions inventory.	2. As part of the ESCR.
		2. Integrate energy efficiency standards into the design of its new commercial premises and the repowering or retrofitting of existing ones.	3. Implementation reports.	3. As part of the ESCR.
		3. Integrate energy efficiency standards for its existing DC, administrative offices, and commercial premises.	4. Water efficiency plan for its existing DC, administrative offices, and commercial premises.	4. 18 months after signing the loan agreement.
3.2	Water Consumption	1. Develop a water usage program to improve efficiency and promote the reduction of consumption.	1. Water efficiency program.	1. No later than 365 days after signing the loan agreement.
		2. Implement the water efficiency program.	2. Evidence of implementation.	2. As part of the ESCR.
3.3	Waste	3. Develop a comprehensive management procedure for non-hazardous waste (including recyclables, common waste, and organic waste) for its new and existing DCs, headquarters, and commercial premises.	3. Comprehensive management procedure for non-hazardous waste.	3. No later than 210 days after signing the loan agreement.
		4. Implement the comprehensive waste management procedure for non-hazardous, hazardous, and special waste.	4. Evidence of implementation.	4. As part of the ESCR.
3.4	Hazardous Materials Management	1. Develop a procedure for handling hazardous materials (fuels, lubricating oils, paints, etc.) applicable to the DC.	1. Procedure for handling hazardous materials.	1. No later than 300 days after signing the loan agreement.
		2. Implement the procedure for handling hazardous materials.	2. Evidence of implementation.	2. As part of the ESCR.
3.5	Pesticide Use and Management	1. Verify that the products used for pest control are not on the list of pesticides classified as Ia (extremely hazardous) or Ib (hazardous) under the recommended classification of the World Health Organization (WHO).	1. Evidence of verification.	1. No later than 180 days after signing the loan agreement.
<b>PS 4: Community Health, Safety, and Security</b>				
4.1	Infrastructure and Equipment Design and Safety	1. Develop a Road Safety Plan.	1. Road Safety Plan.	1. 30 days prior to the start of operation.
		2. Implement the Road Safety procedure.	2. Evidence of implementation.	2. As part of the ESCR.
4.2	Security Personnel	1. Prepare a corporate-level Physical Security Management Manual that encompasses professional ethics and human rights topics, integrating the United Nations' Voluntary Principles (VPs) on Security and Human Rights.	1. Updated training plans.	1. No later than 365 days after signing the loan agreement.
		2. Update the training program to include guidelines on the progressive use of force and describe appropriate behaviors towards workers and affected communities	2. Course content.	2. No later than 365 days after signing the loan agreement.
		3. Implement the United Nations' VPs on Safety and Human Rights course.	3. Evidence of implementation.	3. No later than 365 days after signing the loan agreement.