

4. Environmental and Social Action Plan (ESAP)

No.	Aspect	Action	Product	Completion Date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Environmental and Social Management System	Update and adopt the Comprehensive Management Plan so that it contains: 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.	<ol style="list-style-type: none"> Updated ESMS. Evidence of having adopted the ESMS. 	<ol style="list-style-type: none"> 6 months after the financial closing of the operation. 12 months after the financial closing of the operation.
PS 2: Labor and Working Conditions				
2.1	Lighting Conditions	Where necessary, improve lighting conditions in keeping with OHSAS 18001.	<ol style="list-style-type: none"> Measurement of lighting conditions Change of light fixtures to improve lighting conditions. 	<ol style="list-style-type: none"> 6 months after the financial closing of the operation. 24 months after the financial closing of the operation.
2.2	Internal Grievance Mechanism	Incorporate anonymous grievance mechanisms to the Ethics Hotline; detail how suggestions, grievances or complaints are registered, investigated, evaluated, and resolved.	<ol style="list-style-type: none"> Internal Grievance Mechanism. Evidence of worker induction on the grievance mechanism. 	<ol style="list-style-type: none"> 6 months after the financial closing of the operation. 6 months after the financial closing of the operation.

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2.3	Contractor Management	Formalize contractor management and control procedures via a Contractors Manual.	Contractors Manual	6 months after the financial closing of the operation.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Storage Conditions	Provide a secondary containment system to prevent pollution in the event of spills.	Secondary containment in the warehouse.	6 months after the financial closing of the operation.
PS 4: Community Health, Safety and Security				
4.1	Community Relations	Appoint a Community Relations Officer.	Letter of appointment.	Prior to the financial closing of the operation.
4.2	Grievance Mechanism	Prepare and adopt a community grievance mechanism that details how suggestions, grievances and complaints are registered, investigated, evaluated, and resolved.	External Grievance Mechanism	6 months after the financial closing of the operation

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4.3	Security Company	Train all security guards on voluntary principles and proportional use of force.	Evidence of Training	Within 12 months after the financial closing of the operation.