

6. Environmental and Social Action Plan (ESAP)

Task Title/Description	Anticipated Completion Date	Indicator of Completion
Policy: The overarching Policy statement will be strengthened to align with the 2012 Performance Standards. Once updated, the policy will be communicated to contractors and suppliers	11/30/2017	Policy Updated and communicated to all staff, contractors, suppliers and stakeholders.
Identification of Risks and Impacts: NS AGRO will update its risk management process to (a) Review its risk assessment whenever there is a change in legal regulations, processes, technology, activities or an expansion; (b) Improve identification of risks and impacts of its operations to communities on a periodic basis	a) 11/30/2017 b) 11/30/2017	a) Risk assessment process reviewed b) Upgraded risk management procedure addressing communities
Management Programmes: NS AGRO shall: a) Formalize ESMS management procedures for external engagement including and an external grievance mechanism; b) Formalize management procedures for supply chain management; c) Implement ESMS management procedures for integrated pest and disease management; d) Implement ESMS management procedures for a Code of Conduct for the security personnel at the Company facilities, and manage each identified risk in alignment with the Voluntary Principles (VPs) on Security Forces and Human Rights of the United Nations	a) 12/15/2017 b) 03/30/2018 c) 8/30/2018 d) 11/30/2017	a) ESMS procedure for external engagement and a external grievance mechanism b) ESMS procedure for supply chain management c) ESMS procedure for integrated pest and disease management d) ESMS procedure for Code of Conduct for the security personnel
Organization Capacity and Competency: NS AGRO will present to IIC a copy of the internal memorandum appointing a corporate level environmental and social person with managerial responsibilities exclusively for environmental and social issues, reporting to Corporate Human Resources Manager	10/31/2017	Copy of Memorandum appointing a corporate level environmental and social person
Emergency Preparedness and Response: NS AGRO will update its emergency preparedness and response procedures to: a) account for emergency planning to involve neighbors; b) implement progressive on-going training	a) 12/15/2017 b) 03/31/2018 c) 12/15/2017 and Duration of Loan	a) Updated Emergency Preparedness and Response procedures for

<p>programmes for all employees on Emergency Preparedness and Response, and training of managers on risk identification, planning and management; c) conduct mock drills with performance reports; d) demonstrate gradual implementation of multi-emergency equipment (connected to a sustainable energy source), such as early warning systems, alarms, and chemical emergency spills equipment; and, e) review its emergency response procedures whenever there is a change in processes, technology, activities or an expansion</p>	<p>d) 08/31/2018 e) 11/30/2017</p>	<p>external emergency management b) Procedure for the training programmes c) Procedure to conduct mock drills d) Multi-emergency equipment implemented e) Updated emergency response procedure</p>
<p>Stakeholder Engagement: NS AGRO will a) mapping of stakeholders (immediate neighbors), communicating and informing them of risks, mitigation and monitoring efforts, and keeping a robust external grievance mechanism throughout the life of the project, to be used by the neighbors to express concerns about the company operations and impacts. In addition, the Company will: b) formalize the external grievance mechanism (GM), and will develop and implement a grievance documentation system for logging grievances and their follow-up. NS AGRO will demonstrate to IIC that there has been proactive dissemination of the procedure to employees and neighbors; c) the implemented mechanism shall include dissemination of the GM, training of workers on the GM, and how individuals may register grievances publicly or anonymously, brought to the attention of senior management, and resolved; d) review and revise its existing website to keep external parties informed and include a clearly visible tab and name of contact person at NS AGRO for accessing a grievance mechanism's contact points and associated information to express concerns and complaints about Company operations; e) Any event with neighbors will be recorded in the Annual Report to IIC</p>	<p>a) 05/31/2018 b) 07/31/2018 c) 08/30/2018 and Duration of Loan d) 06/30/2018 e) Duration of Loan</p>	<p>a) Stakeholders (neighbors) map Updated b) Corporate External Grievance Mechanism and procedures formalized c) Documentary evidence that GM has been disseminated in the neighborhood and workers have been trained d) Website updated with name of NS AGRO contact person for accessing the grievance mechanism e) Report any GM events in the Annual Report to IIC</p>

<p>PS 1 ESMS Compliant: a) The Company is required to demonstrate a 2012 PS1 compliant Corporate Environmental and Social Management System (ESMS). To close gaps and demonstrate compliance of the ESMS, NS AGRO will provide to IIC its Procedures Manual for review and clearance; b) Compliance with the 2012 PS1 ESMS element requirements will be verified by IIC through a site supervision visit</p>	<p>a) 01/31/2019 b) 03/31/2019</p>	<p>a) Procedures manual for the ESMS b) PS1 ESMS Compliant</p>
<p>Employee Grievance Mechanism (GM): NS AGRO will: a) Revise and review the GM procedure to ensure that worker grievances can be presented anonymously; b) Records will be maintained on actions taken by NS AGRO, feedback provided, and signed agreement by the employee on resolution of each grievance</p>	<p>a) 10/31/2017 b) 10/31/2017 and Duration of Loan</p>	<p>a) Updated Employee GM procedure to ensure grievances can be presented anonymously b) Records of all GM incidents reported in Annual Report to IIC</p>
<p>Occupational Health and Safety (OHS): NS AGRO will a) provide PPE to employees at the Distribution Centers, based upon MSDS and/or ICSCs for the materials being handled, providing documentary and photographic evidence to IIC of compliance; b) present to IIC documentary evidence of the training of employees handling pesticides specifically in the use of adequate Personal Protective Equipment (PPE) based upon MSDS and/or ICSCs; c) will continuously monitor the cholinesterase levels in workers handling pesticides at the DC's and report annually to IIC; d) will review and update the operating of emergencies involving stations for eye and body washers, and handling of accidental spills, including containment kits</p>	<p>a), b), c), and d) 10/31/2017 and Duration of Loan</p>	<p>a) Invoices and photographic evidence of PPE based on MSDS and/or ICSCs pesticide hazard procured and delivered to employees b) Annual Report to IIC with list of training and content of training sessions to employees handling pesticides c) Cholinesterase baseline Report on 10/31/2017, and report each year to IIC d) Updated operating procedures of emergencies involving stations for eye and body washers, and handling of accidental spills,</p>

		including containment kits
Fire Safety: NS AGRO will ensure that once per annum each DC's will carry out a fire mock drill with participation of all employees, the local fire department, and if applicable, residents from immediate neighboring households. Performance reports will be shared with the Fire Department and any non-conformities will be addressed by NS AGRO and reported to IIC annually	10/31/2017 and Duration of Loan	Annual report to IIC with section showing number and details of fire drills, with documentary photographic evidence of participation of the local fire department and communities if applicable
Hazardous Materials Management and Safety: NS AGRO will ensure that ESMS procedures for materials management and safety will adhere to the provisions of the Food and Agriculture Organization's International Code of Conduct on Pesticide Management	11/30/2017	ESMS procedure for materials management and safety following Food and Agriculture Organization's International Code of Conduct on Pesticide Management
Pesticide Management: NS AGRO will provide IIC for approval, a plan to address compliance with pesticide management as required under PS3	12/15/2017 and Duration of Loan	PS3 compliant plan for pesticide management
Integrated Pest and Disease Management (IPDM): NS AGRO will: a) identify ways to promote the use of the IPDM programmes amongst its clients, making use of the Company's own technical team or through the involvement of local and/or international advisers in plant health systems. The IPDM Programmes shall include crop management cultural practices, insect/disease monitoring, pest/disease ecology, biological control, and other control components, and use of pesticides only after other pest management practices have failed or proven inefficient. If a pesticide chemical formulation is also required as part of the IPDM, then this component will aim to carry a less significant weight than the other components of the full IPDM programme. Also, b) NS AGRO will fully incorporate integrated pest and disease management procedures into the ESMS Procedures Manual; and c) Report each year the number of clients where IPDM is implemented	a) 07/15/2018 and Duration of Loan b) 11/30/2018 c) Duration of Loan	a) Integrated pest and disease management Programme implemented with NS AGRO clients b) IPDM procedures into the ESMS Procedures Manual c) Report each year the number of clients where IPDM is implemented
Community Health and Safety: NS AGRO will: a) develop a Company Code of Conduct for engagement of neighbors; b) further enhance ESMS procedures to ensure transport minimizes health and safety risks to neighbors, including accident prevention measures, such as appropriate speed limits and safe driving practices	a) and b) 02/15/2018	a) Evidence of implementation of External Engagement Plan and Company Code of Conduct b) Updated ESMS Procedures for safe transport

<p>Security Management Plan and Operating Procedures: NS AGRO will manage security forces in accordance with PS4 requirements as described in paragraph 12 – 14, and will provide a means for neighbors to channel complaints about the Company’s security arrangements or personnel. The Company will prepare a corporate level procedure to address and manage each identified risk in alignment with the Voluntary Principles (VPs) on Security Forces and Human Rights of the United Nations. An incident response system involving security forces will be implemented to ensure that all incidents are registered and responded to using correct disciplinary actions where required.</p>	<p>04/30/2018</p>	<p>Documentary evidence of implemented Security Operating procedures in accordance with PS4 requirements, including alignment with the UN Voluntary Principles on Security Forces and Human Rights, and also the incident response system involving security forces</p>
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