

## Environmental and Social Action Plan (ESAP) Vasconia – MEXICO

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No.	Aspect	Action	Deliverable	Compliance Date
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>				
1.1	E&S Assessment and Management System	1. Update the Integrated Management (Vasconia Brands) and Quality (Almexa) Systems to include: (i) policies; (ii) procedures to identify, assess, and manage possible environmental, social, and occupational health and safety risks and impacts, including for contractors and subcontractors, and the supply chain; (iii) definition of functions and allocation of responsibilities for their implementation; (iv) emergency preparedness and response protocols; (v) key stakeholder participation methods or plans; (vi) external communication and grievance mechanisms; (vii) protocols for system evaluation and continuous improvement; and (viii) regular audit and inspection frequencies and requirements with regard to environmental, social, and occupational health and safety matters.	1. Updated Management Systems.	1. Ten months after signing the contract.
		2. Socialize the Integrated Management and Quality Systems with all relevant employees.	2. Proof of dissemination to all levels of the Vasconia Group and its divisions.	2. Twelve months after signing the contract and then as part of the Environmental and Social Compliance Report (ESCR).
1.2	Policy	1. Submit a Safety, Health, Environment, and Social Responsibility policy approved by Management, specifying the person responsible for its enforcement.	1. Policy approved by Management.	1. Ten months after signing the contract.
		2. Disseminate the Policy internally (at all organizational levels) and externally.	2. Evidence of its socialization.	2. Six months after signing the contract.
1.3	Organizational Capacity	1. Supplement the Annual Training Plan to include training courses on the IDB Invest Sustainability Policy.	1. Annual Training Plan.	1. Three months after signing the contract.
		2. Strengthen organizational capacity by defining roles and resources to monitor E&S and OHS compliance and the implementation of the ESMS.	2. Organizational chart for the Group and each division (Almexa and Vasconia Brands), with allocation of responsibilities.	2. Three months after signing the contract.

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1.4	Emergency Preparedness and Response	Strengthen the Emergency Response Plan to include: i) drills for all shifts; ii) methods of participation for all employees; iii) coordination and drill execution procedures between Almexa and Vasconia Brands in the Cuautitlán and Tulpetlac plants; and iv) participation protocols for neighboring industries and external stakeholders (police, fire brigades, others).	Emergency Response Plan for all six plants.	Eight months after signing the contract.
1.5	Stakeholder Engagement	1. Submit a stakeholder participation plan that includes disclosure and dissemination procedures for information relating to impacts and the actions to avoid them	1. Stakeholder participation plan.	1. Four months after signing the contract.
		2. Submit evidence of the implementation of the participation plan.	2. Minutes of meetings with identified stakeholders.	2. Annually as part of the Environmental and Social Compliance Report (ESCR).
<b>PS 2: Labor and Working Conditions</b>				
2.1	Fire Protection System	1. Taking <a href="#">NFWA</a> standards as a benchmark, submit a gap analysis of the current fire protection system of the five operating plants (Querétaro, Cuautitlán, y Tultitlán).	1. Gap analysis of the five plants.	1. Ten months after signing the contract.
		2. Design the Veracruz plant's fire protection system as per NFWA standards.	2. Design of the Veracruz fire protection system.	2. Three months after signing the contract.
		3. If necessary, prepare an adequacy plan to ensure the operating plants' compliance with NFWA standards, to include actions and deadlines.	3. Adequacy and progress plan.	3. Annually as part of the ESCR.
2.2	Supply Chain	Update Almexa's acquisitions process (GGE-06-P) and recycled (scrap) aluminum acquisition/delivery process to include the need to perform annual inspections to ensure scrap suppliers' compliance with labor, environmental, and occupational health and safety regulations.	Updated protocol and process.	Six months after signing the contract.
<b>PS 3: Resource Efficiency and Pollution Prevention</b>				
3.1	Resource Efficiency	Monitor and manage: air emissions (furnaces); noise; wastewater treatment and discharge; solid hazardous and non-hazardous waste, and compare the results with applicable environmental requirements.	Results of the monitoring campaigns.	Biannually after signing the contract.
3.2	Pollution Prevention	1. Keep a record of resource consumption (hydrocarbons, electric power, water, etc.) and waste production (common, hazardous, special handling) by division (Almexa and Vasconia Brands) and plant.	1. Resource consumption and waste production record.	1. Annually as part of the ESCR.
		2. Develop and implement a plan for the efficient use of resources and waste reduction and use.	2. Reduction and efficient use plan by plant and by division.	2. Annually as part of the ESCR
3.3	Greenhouse Gases	Quantify annual GHG emissions of both divisions (Almexa and Vasconia Brands).	1. Quantification of the Vasconia Group's annual GHG emissions.	1. Annually after signing the contract.
		1. Develop and implement a plan to reduce GHG emissions.	2. Plan to reduce GHG emissions.	2. Nine months after signing the contract.

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<b>PS 4: Community Health, Safety, and Security</b>				
4.1	Community health, safety, and security requirements	1. Prepare a road safety plan for the Veracruz plant.	1. Road safety plan.	1. Four months after signing the contract.
		2. Implement the Veracruz plant's road safety plan	2. Evidence of having implemented the plan.	3. As part of the ESCR.