

MASSY GROUP – TRINIDAD, BARBADOS
Environmental and Social Action Plan (ESAP)

No.	Aspect	Action	Deliverable	Delivery date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Environmental and Social Management System	1. To overcome regional documentation differences, develop a single Environmental and Social Management System (ESMS) initially covering TT Investment and the BD Investments in the Integrated Retail Portfolio (IRP).	1. Manual for the IRP ESMS	1. October 31, 2025
		2. Prepare a plan for rolling out the new ESMS (ref. 1.1.1 above) template across the IRP portfolio.	2. Evidence of roll out plan	2. Plan by October 31, 2025, then as part of each Environmental and Social Compliance Report (“ESCR”)
		3. Present a construction phase ESMS for the BD Project.	3. ESMS documentation	3. March 31, 2025
		4. Implement the BD Project ESMS.	4. Evidence of implementation	4. As part of each ESCR
1.2	Organizational Capacity	1. Appoint an environmental and social (E&S) manager to oversee the development and implementation of the IRP ESMS.	1. Executed contract	1. March 31, 2025
		2. Contract an Environmental, Health & Safety manager (or management firm) for full-time, on-site supervision of the construction of the BD Project.	2. Executed contract	2. Prior to the NTP for start of construction of BD Investment
1.3	Risk Assessment	1. Incorporate climate risk into the IRP Hazard Risk Matrix.	1. Updated Hazard Risk Matrix	1. Prior to the date of the first disbursement
1.4	Cumulative Impact Analysis	1. Make a best effort to engage neighboring companies to prepare a cumulative impact assessment (CIA) and cumulative impact mitigation plan (CIMP) for the TT Project.	1. Progress report on CIA and CIMP	1. March 31, 2025
		2. Implement the CIMP	2. Evidence of implementation	2. As part of each ESCR
1.5	Emergency Preparedness and Response	1. Ensure Emergency Preparedness and Response Plan (EPRP) are regularly updated, including climate and natural disaster risks, for each facility in the IRP portfolio in collaboration with local authorities and emergency response providers (e.g., hospitals, ambulance services, and firefighter services).	1. EPRPs for all IRP facilities	1. Report on status by October 31, 2025
		2. Implement the EPRPs	2. Evidence of implementation	2. As part of each ESCR.
1.6	Stakeholder Engagement	1. For new IRP property development project involving construction or renovation activities, develop a stakeholder engagement plan (SEP) that includes protocols and procedures for disclosing project-related information to affected communities on an ongoing basis.	1. SEP for new developments	1. Prior to the NTP for start of construction of BD Investment
		2. Implement the SEP.	2. Evidence of implementation	2. As part of each ESCR
PS 2: Labor and Working Conditions				
2.1	Occupational Health and Safety	1. Ensure the availability of an ambulance during all working hours at the TT project site.	1. Evidence of availability (e.g. executed contract)	1. Prior to the date of the first disbursement
		2. Implement a formal permit-to-work system for all work at heights, hot works, and electrical works at the TT Project site.	2. Evidence of implementation	2. As part of each ESCR

2.2	Workers engaged by Third Parties	1. Incorporate a procedure into the IRP ESMS for developing and implementing contractor management plans (CMPs) for all IRP business units and new development projects.	1. CMP procedure as part of IRP ESMS	1. October 31, 2025
		2. Implement the CMP procedure.	2. Evidence of implementation	2. As part of each ESCR
2.3	Supply Chain Risks	1. Include a procedure in the consolidated IRP ESMS to monitor and identify the risks of child and forced labor in Massy's primary supply chain of groceries.	1. Grocery supply chain procedure	1. October 31, 2025
		2. Implement the grocery supply chain procedure (as described in 2.3.1).	2. Evidence of implementation	2. As part of each ESCR
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Pollution Prevention	1. Incorporate procedures into the TT Project Environmental Management Plan (EMP) to meet each of the requirements in the project's Certificate of Environmental Clearance from the Environmental Management Authority.	1. Updated project EMP	1. Prior to date of the first disbursement
		2. Implement the TT Project EMP in its entirety.	2. TT Project E&S audit report	2. As part of each ESCR
3.2	Waste Management	1. Include waste management procedures in the consolidated IRP ESMS, including measures to address flooding risks, to ensure that all hazardous wastes generated or stored at IRP businesses are properly managed.	1. Waste management procedures	1. October 31, 2025
		2. Implement the waste management procedures.	2. Evidence of implementation	2. As part of each ESCR
3.3	Hazardous Materials Management	1. Within the consolidated IRP ESMS (ref. 1.1.1 above) include procedures for hazardous materials risk assessment and related risk management of the stores and warehouses in IRP.	1. Risk management procedure specific to each location	1. October 31, 2025
		2. Implement the hazardous materials risk management procedure.	2. Evidence of implementation	2. As part of each ESCR
		3. Ensure the consolidated IRP ESMS principles for hazardous materials risk assessment and management procedure are included in new construction and renovation projects	3. Evidence of implementation	3. As part of each ESCR
3.4	Pesticide Use and Management	1. Include a procedure in the consolidated IRP ESMS ensuring that third party pest control services only use chemical pesticides (including rodenticides) that: (i) are packaged in safe containers; (ii) are clearly labeled for safe and proper use; (iii) are manufactured by an entity currently licensed by relevant regulatory agencies; and (iv) do not fall in the World Health Organization's (WHO) Recommended Classification of Pesticides by Hazard Class Ia or Ib.	1. Pesticide management procedure	1. October 31, 2025
		2. Implement the pesticide management procedure.	2. Evidence of implementation	2. As part of each ESCR
PS 4: Community Health, Safety, and Security				
4.1	Infrastructure and Equipment Design and Safety for the BD Project	1. Obtain a certificate from a qualified specialist to ensure the facilities' designs are consistent with the principles of universal access.	1. Certificate	1. Prior to the NTP for start of construction of BD Investment
		2. Develop a fire management plan.	2. Fire management plan	2. Prior to the NTP for start of construction of BD Investment
		3. Contract a life and fire safety ("L&FS") system professional to certify that (a) all buildings were built according to approved L&FS designs, (b) all equipment was installed as per L&FS design, and (c) all L&FS equipment was tested following international standards.	3. Certificate	3. Prior to opening the facilities to the public
4.2	Hazardous Materials Management and Safety	1. For the BD Project and based on a hazard risk assessment, develop a hazardous materials management plan (HMMP), that includes potentially hazardous materials contained in existing structures to be demolished as part of the redevelopment process.	1. HMMP specific to the BD Project	1. Prior to demolition start
		2. Implement the HMMP.	2. Evidence of implementation	2. As part of each ESCR
4.3	Community Exposure to Disease	1. Develop a procedure for ensuring that the elimination of standing water is incorporated into management plans for new project construction or renovation sites, including the TT Project site.	1. Standing water abatement procedure	1. Prior to construction start.

		2. Implement the water removal procedure.	2. Evidence of implementation	2. As part of each ESCR
4.4	Emergency Preparedness and Response for the <u>BD Project</u>	1. Develop an EPRP for the construction phase in collaboration with local authorities and emergency response providers.	1. Construction phase EPRP	1. Prior to construction start.
		2. Implement the EPRP for the construction phase.	2. Evidence of implementation	2. As part of each ESCR
		3. Develop an EPRP for the operation phase in collaboration with local authorities and emergency response providers.	3. Operation phase EPRP	3. October 31, 2025
		4. Implement the EPRP for the operation phase	4. Evidence of implementation	4. Prior to operational start, and as part of each ESCR
4.5	Security Personnel	1. Include in the consolidated IRP ESMS a procedure for ensuring that Massy-contracted security arrangements adhere to accepted international principles for rules of conduct, training (including rules of engagement, the use of proportional force and appropriate conduct towards local communities), equipment, and monitoring.	1. Security forces management procedure	1. October 31, 2025
		2. Implement the security forces management procedure.	2. Evidence of implementation	2. As part of each ESCR.