

PROJECT RIO TINTO LITHIUM GREENFIELD PROJECT IN ARGENTINA – 15258-01
Environmental and Social Action Plan (ESAP)

S. no	Description	Anticipated Completion Date
1	The borrower will further refine and implement its Environmental and Social Management Systems (ESMS) commensurate with the risks and impacts of the project per the requirements of IFC PS1 and local requirements. The ESMS will include an update to the project's Regulatory Obligations Register, which will document all E&S obligations made by the borrower in the ESIA, the E&S disclosure package, and through acceptance of all regulatory conditions. The register will specify which entity (borrower, specific contractor, multiple contractors) is responsible for implementing each obligation. These obligations will be integrated into the to-be-developed sub-plans & procedures. The Construction Environmental Management Plan (CEMP) will be updated accordingly.	04/30/2026
2	The borrower will update its E&S clauses to require contractors and subcontractors to comply with IFC PSs, and E&S obligations defined in the Regulatory Obligations Register, as applicable to their scopes of work. Furthermore, the clauses will contain clear provisions related to labor standards and define labor monitoring expectations.	12/31/2025
3	The borrower will develop and implement an Operations Environment & Social Management Plan (OESMP) consistent with IFC PSs, national requirements, and all relevant E&S Obligations. The borrower will require its operations contractors to develop implementation plans aligned with the OESMP and applicable to its scope of work	12/31/2027
4	The borrower will update and further refine its E&S Monitoring Program (E&S MP), which will define monitoring requirements (including those established in the E&S Disclosure Package) throughout the project's lifecycle. The E&S MP will define monitoring locations, parameters, frequencies, etc., which will be regularly reviewed and adjusted as required. The E&S MP will establish 'Trigger, Alert and Response Plans' (TARP's) for sensitive components, including groundwater, surface waters, key biodiversity components, and priority ecosystem services, defining conditions that activate an alert, alert values thresholds, and response plans that outline the actions to be taken when an alert is triggered.	03/31/2026
5	The borrower will develop a 'Worker Handbook' applicable to their employees and will include information related to general employment terms and conditions (e.g., working hours, entitlements, social security, H&S obligations), collective agreements, worker associations, retrenchment, non-discrimination, etc., and provide a link or reference to relevant sponsor policies, plans, and procedures. The borrower will require all contractors employing project workers at the Project site to develop a 'Worker Handbook' applicable to their workers and will include information related to general employment terms and conditions (e.g., working hours, entitlements, social security, H&S obligations), collective agreements, worker associations, retrenchment, non-discrimination, etc., and provide a link or reference to relevant company policies, plans, and procedures.	01/31/2026
6	The borrower will enhance its management of third-party workers by establishing a procedure defining its approach to managing, providing oversight of, and monitoring project contractors' and subcontractors' compliance with local labor laws, IFC PS2, and consistent with the general principles described within IFC Good Practice Note: Managing Contractors' Environmental and Social Performance.	12/31/2026
7	The borrower will establish a more accessible, confidential first contact point for worker-related grievances and develop procedures to connect corporate-level mechanisms, such as My Voice and CareHub, with the site-level system. The borrower will tailor the referral pathway of CareHub to the project's operational context with a gender responsive and survivor-centered approach implemented by trained personnel, ensuring accessibility for both direct employees and third-party workers. Furthermore, the borrower will develop and implement a communication and training program on the grievance mechanism for staff, third-party workers, and management.	03/31/2026
8	The borrower will commission an assessment for each of the identified potential mitigation measures, confirming their viability, permitting requirements (for their implementation), and providing a cost estimate. Should the mitigation measures be deemed unfeasible, the borrower will propose alternate measures.	12/31/2027

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9	The borrower will complete numerical groundwater simulations to demonstrate the possibility of localized reinjection to limit post-closure water-table drawdown at the Ojos de Agua.	02/28/2026
10	The borrower will develop and implement an influx management plan, aligned with IFC PSs, to monitor and mitigate influx and potential GBV-related impacts. The plan will consider i) awareness-raising activities for prevention and addressing GBV for community members, local authorities, and project workers; ii) monitoring procedures and KPIs to monitor impacts; and iii) survivor-centered grievance procedures, with mapped referral pathways to local GBV specialized services. Furthermore, the influx management plan will consider measures for monitoring, preventing, mitigating, and compensating for impacts to community members that there is reasonable evidence are caused or linked to the borrower's activities or the project development.	07/31/2026
11	The borrower will revise its existing security risk assessments to identify potential risks posed by the project's security arrangements on internal and external stakeholders. Based on the assessment, the borrower will develop and implement a Security Forces Management Plan (SFMP) for managing private security forces aligned with national requirements, IFC PS4, and VPSHR. The SFMP will include security selection/evaluation procedures and a security code of conduct to guide the interactions between security personnel, workers, and community members. Furthermore, the SFMP will include provisions for systematic training regarding GBV, human rights, and the use of force, and formal procedures for reporting, responding to, and documenting security incidents, which will be communicated to relevant stakeholders. The borrower will work with the provincial and federal governments in order to establish a formal Memorandum of Understanding with the Argentinian security forces aligned with IFC PS4.	02/28/2026
12	The borrower will develop and implement a livelihood restoration plan aligned with IFC PS5.	03/31/2026
13	The borrower will install fit-for-purpose bird flight detectors staggered along the entire length of the two overhead transmission lines being constructed by the project.	12/31/2027
14	The borrower will develop and implement a post-construction fatality monitoring (PCFM) program based on Good International Industry Practice to monitor bird flight activity, assess the effectiveness of mitigation, and identify any further measures to be taken in line with an adaptive management approach.	07/31/2026
15	The borrower will develop and implement a Biodiversity Management and Monitoring Plan that defines all mitigation measures for construction and operations, and details monitoring activities to evaluate the effectiveness of such measures.	03/31/2026
16	The borrower will develop a Biodiversity Action Plan (BAP) to achieve no net loss for Natural Habitat and net gains for Critical Habitat species. Given that the project's infrastructure is located within a legally protected area, the BAP will also include additional conservation actions. It will be developed in consultation with relevant stakeholders.	12/31/2027
17	The borrower will develop and implement an Indigenous Peoples Plan (IPP), aligned with IFC P7. The IPP will outline the borrower's commitment to conducting ongoing, culturally appropriate engagement as part of the FPIC process and outline monitoring processes for continuous evaluation of the implementation of the IPP.	03/31/2026
18	The borrower will enhance its grievance mechanisms to include a gender responsive and survivor-centered approach and develop appropriate plans for implementation, training and dissemination of the mechanism across the relevant communities., designed to avoid revictimization, support survivors and refer them to specialized GBV and/or child protection services duly mapped in the project area and, develop of a CGM flowchart and response timeline so that communities are clear on who receives each type of complaint and principles of confidentiality, anonymity and non-retaliation.	05/31/2026