

**ANSA McAL Group – Trinidad and Tobago
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	Based on ANSA McAL's existing E&S policies, plans and procedures, develop and implement a comprehensive environmental and social management system ("ESMS") tailored to the activities at the Champs Fleurs compound (the "Compound") and the Matura sand quarry, and including: (i) a Stakeholder Engagement Plan that includes protocols and procedures for disclosing project-related information on ongoing basis to communities neighboring the Compound or the sand quarry; and (ii) a formal External Grievance Mechanism to ensure transparent engagement with stakeholders and timely resolution of concerns.	1. ESMS manual and associated documents 1a. Evidence that the ESMS is being implemented	1. March 31, 2027 1a. As part of each subsequent Environmental and Social Compliance Report ("ESCR")
1.2	Sustainability Policy	Develop and rollout a Group-wide Sustainability Policy in alignment with the Group's sustainability business priorities and reporting commitments.	Group Sustainability Policy	September 30, 2026
1.3	Cumulative Impact Analysis	Conduct a cumulative impact analysis for the sand quarry and make a best effort to engage other relevant actors in mitigating any significant impacts identified.	Cumulative Impact Assessment	September 30, 2026
1.4	Gender Risk Management	Develop and implement a Gender Action Plan addressing attraction, working conditions, pipeline development, workplace culture and monitoring to increase female representation Group-wide.	1. Gender Action Plan 1a. Evidence that the plan is being implemented	1. September 30, 2026 1a. As part of each ESCR
1.5	Emergency Preparedness and Response	Develop a Fire and Life Safety Action Plan to implement the recommendations of the risk assessment at CDC.	Fire and Life Safety Action Plan	November 30, 2026
PS 2: Labor and Working Conditions				
2.1	Occupational Health and Safety	1. Develop and implement a Dust Management and Control Plan for reducing dust in CGL's raw materials handling, storage, batch mixing and feed processes.	1. Dust Management and Control Plan 1a. Evidence that the plan is being implemented	1. September 30, 2026 1a. As part of each ESCR
		2. Develop and implement a Worker Hydration Program covering the entire Compound but with an extra focus on the Hot End of the glassworks at CGL.	2. Worker Hydration Program. 2a. Evidence that the plan is being implemented	2. September 30, 2026 2a. As part of each ESCR
		3. Develop and implement a comprehensive set of Environmental, Health and Safety ("EHS") protocols for the Trinidad operations of CDC, mirroring those already prepared for CGL.	3. Complete set of EHS documents 3a. Evidence that the protocols are being implemented	3. September 30, 2026. 3a. As part of each ESCR
2.2	Provisions for People with Disabilities	1. Develop and implement an Accessibility Action Plan for improving accessibility for persons with disabilities in office and publicly accessible spaces at the Compound.	1. Accessibility Action Plan 1a. Evidence that the plan is being implemented	1. June 30, 2026 1a. As part of each ESCR
		2. Design and construct the new infrastructure at CDC (e.g., the new warehouse and office building) to be aligned with the principles of universal access.	2. Certificates from qualified professional confirming that the (a) the design and (b) the construction are in alignment with universal access	2. On completion of (a) infrastructure design and (b) the infrastructure construction
PS 3: Resource Efficiency and Pollution Prevention				

No.	Aspect	Action	Deliverable	Delivery date
3.1	Greenhouse Gases	1. Develop and implement a Refrigerant Transition Plan to identify and phase out any use of high Global Warming Potential refrigerants (e.g., R134A, R410A, and R22) at the Compound.	1. Refrigerant Transition Plan 1a. Evidence the plan is being implemented	1. September 30, 2026 1a. As part of each ESCR
		2. Using a recognized calculation methodology, estimate Scope 1 and Scope 2 greenhouse gas ("GHG") emissions annually for CGL and CDC.	2. GHG estimates	2. As part of each ESCR
3.2	Pollution Prevention	1. Design a refurbishment of the furnace at CGL to comply with IFC EHS Guideline limits for emissions of NO _x and SO _x .	1. Performance guarantees	1. December 31, 2026
		2. Install equipment to continuously monitor the emissions of NO _x , SO _x , and particulates from the furnace at CGL.	2. Representation that emissions monitoring devices are installed	2. March 31, 2027
		3. Develop and implement an Air Quality Management and Monitoring Plan for CGL.	3. Air Quality Management and Monitoring Plan 3a. Evidence that the plan is being implemented	3. December 31, 2026 3a. As part of each ESCR
PS 4: Community Health, Safety, and Security				
4.1	Pesticide Use and Management	Create a procedure to prevent inclusion on the Approved Chemicals List of CDC and CGL any WHO Class 1a or 1b chemicals.	Approved Chemicals List procedure	June 30, 2026
4.2	Security Personnel	Develop and implement a Security Management Plan for the Compound and the sand quarry to ensure contracted security arrangements adhere to accepted international principles for rules of conduct, training (including rules of engagement, the proportional use of force and appropriate conduct towards local communities), equipment, and monitoring.	1. Security Management Plan 1a. Evidence that the plan is being implemented	1. June 30, 2026 1a. As part of each ESCR
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
6.1	Protection and Conservation of Biodiversity	Aiming at rehabilitating disturbed areas and enhancing local biodiversity over time, develop and implement a Biodiversity Management and Monitoring Plan ("BMMP") for the sandy quarry, including the following components: (i) a design and schedule for an ecosystem baseline study to understand existing biodiversity conditions; (ii) a practical, phased plan for reforestation and rehabilitation of degraded habitats within the quarry, prioritizing native species and ecosystem functionality; and (iii) monitoring and reporting protocols to track restoration progress and biodiversity outcomes over time, with adaptive management measures to address challenges and improve results.	1. BMMP 1a. Evidence that the plan is being implemented	1. December 31, 2026 1a. As part of each ESCR