

## Environmental and Social Review Summary (ESRS) ANSA McAL Group – Trinidad and Tobago

**Original language of the document:** English  
**Issuance date:** December 19, 2025

### 1. General Information of the Project and Overview of Scope of IDB Invest's Review

ANSA McAL Limited ("ANSA McAL" or the "Group") and its subsidiary Caribbean Development Company Limited ("CDC") are in discussions regarding financing for: i) a capital expenditure ("Capex") program for CDC (including its subsidiary CARIB Brewery Limited) and another ANSA McAL subsidiary, Carib Glassworks Limited ("CGL" – all together, the "Companies"); and ii) supply chain finance, including support for a trade finance facility. Founded in 1947 and based in Trinidad and Tobago, CDC produces some of the Caribbean's most recognizable beer and malt brands, including Carib and Stag, which enjoy strong regional recognition and growing penetration in international markets.

The Capex program for CDC is in line with its long-term strategy and proposes the following planned investments: i) upgrades to the CO<sub>2</sub> recovery infrastructure to significantly increase the amount of CO<sub>2</sub> capture and reused; ii) packer upgrades; iii) construction of a new brewhouse, a new storage warehouse, and a LEED certified administration building; iv) installation of backup power generators; v) installation of a new water treatment and reclamation plant; and vi) fire safety enhancements.

CDC's supply of bottles is manufactured at CGL's glassworks factory, where planned Capex investments include maintenance Capex and the refurbishing of one of CGL's two glass furnaces.

The environmental and social due diligence ("ESDD") process included, among other things, a site visit to the combined CARIB Brewery and Carib Glassworks Limited compound (the "Compound"), including walk-throughs of the main glass and beverage production areas and supporting infrastructure; interviews and meetings with senior management and lead environment, health and safety ("HSE") staff of the Companies; and a review of environmental and social ("E&S") and occupational health and safety ("OHS") information provided by the Companies, such as: the Group HSE Manual; environmental permits and licenses; OHS statistics and risk assessments; and human resources ("HR") and HSE policies and procedures.

To ensure the Project's commitment to respect and protect human rights, its zero tolerance for retaliation, and its commitment to providing and guaranteeing a safe environment for stakeholders to voice their concerns without fear of retaliation, the ESDD process also included a review of the Human Resources Policy Manual and the Group Grievance Procedure.

## **2. Environmental and Social Categorization and Rationale**

The Project has been classified as a Category B operation according to IDB Invest's Environmental and Social Sustainability Policy in consideration of the following potential risks and impacts: i) OHS risks associated with the operation and modernization of beverage and glass production lines; ii) generation of industrial and hazardous solid and liquid waste during ongoing operations and facility upgrades; iii) emissions to air, including dust, nitrogen oxides ("NO<sub>x</sub>") and sulfur oxides ("SO<sub>x</sub>") from raw materials handling and glass furnace operation; and iv) process water effluents. These potential risks and impacts are deemed to be of medium-high intensity.

The Performance Standards ("PS") triggered by the Project are: i) PS1: Assessment and Management of Environmental and Social Risks and Impacts; ii) PS2: Labor and Working Conditions; iii) PS3: Resource Efficiency and Pollution Prevention; and iv) PS4: Community Health, Safety, and Security.

## **3. Environmental and Social Context**

### **3.1 General characteristics of the Project's site**

The Project will be implemented entirely within the confines of the Compound, located in Champs Fleurs, in a well-established, walled industrial zone that fronts the Eastern Main Road highway. It is surrounded by other industrial and commercial facilities on three sides and a residential neighborhood on the fourth (west) side. Silica for the glass production process is obtained from a 21-hectare ("ha") sand quarry operated by CGL near Matura, Trinidad, under a 30-year lease of state lands approved by the Cabinet of the Government of Trinidad and Tobago.

### **3.2 Contextual risks**

Contextual risks in Trinidad and Tobago include high rates of theft, violent crime, and gender-based violence and harassment. ANSA McAL has already implemented reasonable controls to mitigate these risks, as discussed below.

## **4. Environmental Risks and Impacts and Proposed Mitigation and Compensation Measures**

### **4.1 Assessment and Management of Environmental and Social Risks**

#### **4.1.a E&S Assessment and Management System**

CDC and CGL operate under a comprehensive Group HSE Policy Manual, which establishes the framework for environmental, social, and OHS management across all operations. E&S risk management is further supported by the Companies' certifications to ISO 9001:2015 (Quality Management System) and FSSC 22000 (Food Safety Management System) standards. The sand quarry is additionally governed by the terms and conditions outlined in the Certificate of Environmental Clearance ("CEC") issued in 2015 by the Environmental Management Authority ("EMA"). ANSA McAL will consolidate its various E&S policies, plans and procedures relevant to CDC and CGL into a single environmental and social management system (hereafter, the "ESMS") scoped for the activities at the Compound and the sand quarry.

#### **4.1.b Policy**

The Companies operate under an integrated Health, Safety, Sustainability, Environment and Quality ("HSSEQ") policy that mandates the following: i) compliance with applicable HSE laws and industry standards; ii) systematic hazard identification and risk control; iii) workforce training; iv) robust incident reporting and investigation; and v) performance monitoring and review. Additionally, the Group's 2024 *Sustainability and ESG Data Disclosure Report* presents the Group's six Sustainability Business Priorities: Impact Stewardship; Equality; Accountability; People and Communities; Responsible Governance; and Purposeful Investing (which includes "prioritizing resource efficiency"). These priorities are built on the three pillars of environment, social and governance ("ESG"). Within the Environment pillar, the following focal areas are highlighted: climate change mitigation and adaptation; water and marine resources; resource use and circular economy; pollution reduction; biodiversity and ecosystems; and engaging stakeholders. The focal areas highlighted within the social pillar include: safe working; equal opportunity; and employee, customer and consumer well-being. A formal Group Sustainability Policy is in the final phases of development and expected to be rolled out across the Group in 2026.

#### **4.1.c Identification of Risks and Impacts**

In alignment with the Group HSE Policy Manual, the Companies identify risks and impacts through a structured process that includes formal risk assessments conducted annually at a minimum, as well as whenever there are procedural or equipment changes or accidents. The risk assessment process involves five steps: i) identifying hazards through workplace tours; ii) determining who or what could be affected; iii) evaluating the risk level qualitatively; iv) recording significant hazards and control measures; and v) monitoring and reviewing assessments as conditions change. Additionally, task-based risk assessments are required for some higher risk activities, and Job Safety Analyses are conducted for non-routine work to ensure risks are assessed and controls applied.

#### 4.1.c.i Direct and indirect impacts and risks

Primary risks of the glass manufacturing process are the following: OHS risks, such as exposure to high levels of noise, dust, and extreme heat; and air emissions consisting principally of sulfur dioxide, NO<sub>x</sub>, and particulates from the operation of the furnace. Regarding beverage production, the main risks and impacts include OHS risks (such as exposure to high noise levels and broken glass); and intensive water consumption for beverage production and bottling. Additionally, the upgrading of the beverage plant and the refurbishing of the glass furnace will involve OHS risks common to industrial construction activities, as well as the generation of both domestic and hazardous wastes.

#### 4.1.c.ii Analysis of alternatives

Several design options were considered by ANSA McAL for the furnace rebuild project. These considered criteria such as costs (related, for example, to procurement as well as losses during furnace downtime), and potential energy efficiency gains. The selected option will minimize costs while still providing energy efficiency gains relative to the competing options.

#### 4.1.c.iii Cumulative impact analysis

The investments in the glass and beverage factories are expected to reduce the generation of air and water emissions; thus, cumulative impacts are expected to be negligible. For the activities at the Matura sand quarry, the Companies will conduct a cumulative impact analysis, considering the context of other mining operations in the Matura region.

#### 4.1.c.iv Gender risks

In Trinidad and Tobago's manufacturing sector, gender-related risks include barriers to female representation in leadership, unequal pay, and workplace harassment. Women face higher job insecurity, especially in informal roles.

#### 4.1.c.v Gender Programs

Women represent 27 percent of the workforce at CARIB Brewery Limited and CDC and 7 percent at CGL. The Group's HR procedures ensure compliance with the rules and regulations in Trinidad and Tobago that prohibit discrimination in the workplace (e.g., the Equal Opportunity Act of 2000). Furthermore, the Group HSE Policy Manual includes a section dedicated to avoiding and mitigating risks to people who are pregnant or who have recently given birth. The Group will develop and roll out a Gender Action Plan addressing employee pipeline development, recruitment, working conditions, workplace culture and monitoring to increase female representation.

#### 4.1.c.vi Climate change exposure

The National Adaptation Plan of Trinidad and Tobago lists the following among the country's main hazards: flooding, tropical cyclones, and landslides. Flooding, strong winds, and landslides have been especially prominent in recent years. Droughts, though less frequent, can persist for months.

Although Trinidad and Tobago is not frequently affected by direct tropical cyclones due to its location outside of the mid-Atlantic hurricane belt, cyclones remain a significant threat. Climate change is projected to worsen these hydrometeorological hazards, which can directly affect physical infrastructure, along with the associated logistics operations they depend on.

#### 4.1.d Management Programs

The Group HSE Policy Manual details the following management programs that apply across all Group operations: i) the Occupational Health and Safety Management System; ii) the HSE Business Planning Program; iii) the Management of Change Program; iv) the Risk Assessment Program; v) the Job Safety Analysis Program; vi) the Inspection Program; vii) the Accident and Incident Reporting & Investigation Program; viii) the Group HSE Audits Program; ix) the Permit to Work System; x) the Standard Operating Procedures Program; xi) the Personal Protective Equipment Program; xii) the Confined Space Entry Program; xiii) the Lockout/Tag-out Program; xiv) the Lifting Operations and Equipment Management Program; xv) the Hazard Communication Program; xvi) the Process Safety Management and Asset Integrity Management Program; xvii) the Emergency Preparedness & Disaster Recovery Program; xviii) the Environmental Management Program; xix) the Health Risk Management Plan; xx) the Substance Abuse Policy; xxi) the Pest Control Program; xxii) the Reduce, Reuse, Recycle Policy; xxiii) the Rewards & Recognition Program; xxiv) the Document Control Program; and xxv) the Vehicle Safety Program. These high-level programs form the framework on which subsidiary business units develop programs and procedures specific to their individual needs.

#### 4.1.e Organizational Capacity and Competency

Both CGL and CDC are staffed with a qualified Sector EHS manager who reports to the Sector HR Manager as well as to the Group Head of HSE in the corporate head office. Each location also has a Safety Committee that meets monthly to review performance and develop corrective action plans, as necessary, to address any performance gaps that might arise.

#### 4.1.f Emergency Preparedness and Response

Emergency preparedness and response is governed at CGL by the Emergency Response, Evacuation & Incident Command System, which details roles, responsibilities, and protocols for managing emergencies. Scenarios range from minor incidents to major disasters, and include fires, chemical spills, severe weather, and food safety events. The plan covers situational assessment, evacuation, communication, and training. The goal is to ensure coordinated action to protect personnel, property, and the environment while maintaining business continuity and regulatory compliance. The system specifies protocols for contacting and working with external agencies, such as the Trinidad and Tobago Fire Service (“TTFS”), Trinidad and Tobago Police Service (“TTPS”), Office of Disaster Preparedness and Management (“ODPM”), ambulance services, and other relevant organizations during emergencies. For CDC, standard emergency response guidelines and an emergency response procedure have been developed. CGL recently carried out a fire risk assessment of its facilities on the Compound and is implementing a Fire and Life Safety Action Plan to put in place the assessment’s recommendations. CDC carried out a Fire Risk Assessment in August 2024 and the recommendations from this report are being implemented including the installation of fire prevention equipment.

#### 4.1.g Monitoring and Review

OHS and environmental performance are monitored and reported regularly both internally and to relevant authorities. The Group HSE Policy Manual includes procedures for reporting to internal management and, when necessary, to external authorities (such as the Occupational Safety and Health Agency, EMA, TTFS, and TTPS). The manual includes requirements for maintaining records of inspections, incidents, corrective actions, and compliance audits. Reporting is part of the accident investigation and corrective action processes, as well as the continuous improvement cycles. Regarding the sand quarry specifically, ambient air quality monitoring results are submitted to the EMA quarterly, and water quality monitoring results are submitted bi-annually.

#### 4.1.h Stakeholder Engagement

Stakeholder engagement is conducted as required by the EMA for major projects, such as the Water Reclamation Facility being financed as part of this Project. As part of the development of the ESMS, ANSA McAL will develop a Stakeholder Engagement Plan (“SEP”) with a focus on the following aspects: providing the neighboring community with information regarding potential risks and impacts of the Companies’ operations on the community, and the relevant mitigation measures (including emergency response planning) being implemented; protocols and procedures for disclosing project-related information to communities on an ongoing basis; and details regarding the External Grievance Mechanism.

#### 4.1.h.i Disclosure of Information

ANSA McAL publishes information about corporate developments and corporate governance on its company website. Also available on the website is the *2024 Sustainability and ESG Disclosure Report*. In alignment with the IFRS S1 Sustainability Disclosure Standard, the Group has aligned its ESG Data Disclosure reporting to the general principles of the relevant Industry Based, Sustainability Accounting Standards Board (“SASB”) standards and incorporated the double materiality approach, also with reference to the Global Reporting Initiative (“GRI”) standards. ANSA McAL’s Group Internal Audit team was engaged to ensure the data disclosed was accurate and verifiable.

ANSA McAL has committed to voluntary compliance with the IFRS S1 standard, starting with a gap assessment that was conducted in 2024. As a first mover and early adopter in the region in IFRS S1 compliance, the Group reported that at the Head Office level “Governance is the most advanced key content area, with 100% of requirements met or partially met”. On average there was 35 percent compliance or partial compliance with the IFRS S1 requirements in the entities assessed, which included the Beverage Sector (including CDC) and the Packaging Sector (CGL).

The results underscored the progress that the Group has already made in integrating and enhancing sustainability in its businesses and operations. Further progress towards compliance was made in 2025 with a series of workshops with the key Sectors including Beverage and Packaging, the details of which will be disclosed in the 2025 Sustainability Report.

#### 4.1.h.ii Indigenous Peoples

No Indigenous Peoples reside within the area of influence of the Project.

#### 4.1.i External Communication and Grievance Mechanisms

The Companies will establish a formal External Grievance Mechanism to ensure transparent engagement with stakeholders and timely resolution of concerns. This system will include publicly accessible channels (e.g., dedicated email address, phone line, and web portal) for submitting inquiries or complaints, along with clear procedures for acknowledging, assessing, and responding to submissions within defined timeframes. The mechanism will be designed to handle issues confidentially, track resolutions, and provide periodic reporting to management.

#### 4.1.j Ongoing Reporting to Affected Communities

The new SEP will include a structured process for ongoing reporting to the community neighboring the Compound and the settlers along the quarry access road. Reports will include periodic updates on E&S performance relevant to these stakeholders. Reports will be shared through channels such as community meetings and local notice boards, complemented by summary materials in formats and languages appropriate for stakeholders. The reporting process will be documented, with clear timelines and responsibilities, and will include mechanisms for feedback to ensure continuous engagement and responsiveness.

### **4.2 Labor and Working Conditions**

#### 4.2.a Working Conditions and Management of Worker Relationships

The workforce at CDC consists of 1,010 employees, including 674 permanent, 43 temporary/contract, and 293 casual workers. At CGL, the workforce totals 328 employees, including 270 permanent, 10 contract, and 48 casual workers. The Group's policies and procedures are aligned with national labor laws and international standards, and are implemented through formal induction, onboarding, and ongoing training programs.

#### 4.2.a.i Human Resources Policies and Procedures

The Group's Human Resources Policies Manual sets out commitments to non-discrimination, equal opportunity, and the prevention of harassment and victimization. These commitments are reinforced through regular training and awareness programs, as evidenced by training attendance registers and toolbox talks. The HR Policies Manual and Group HSE Policy Manual are cascaded to all business units and contractors.

#### 4.2.a.ii Working Conditions and Terms of Employment

Terms of employment are provided in writing to all employees and are consistent with national legislation and collective agreements. Wages, benefits, and working hours are clearly defined, and all employees are covered by social security and health insurance schemes.

#### 4.2.a.iii Workers' Organizations

The right to freedom of association and collective bargaining is recognized and respected. Collective agreements are in place and documented for CDC, CARIB Brewery and CGL, and workers are free to join unions and participate in labor organizations.

#### 4.2.a.iv Non-discrimination and Equal Opportunity

The Group's HR Policy Manual prohibits discrimination based on race, color, origin, sex, sexual orientation, gender identity, religion, marital status or disability.

#### 4.2.a.v Retrenchment

No retrenchment is planned as part of this operation. Should retrenchment become necessary in the future, the Companies' procedures require compliance with national law, collective agreements, and the provision of appropriate notice and severance benefits.

#### 4.2.a.vi Grievance Mechanism

Internal grievance mechanisms are defined in the Group Grievance Procedure and are further detailed in Collective Labor Agreements ("CLAs"). The Group Grievance Procedure specifies that workers can raise concerns confidentially and without fear of retaliation. Grievance procedures are communicated during induction and are accessible to all employees, including those engaged by third parties.

#### 4.2.b Protecting the Workforce

In 2024, ANSA McAL launched a new Safety Management System ("SMS") to streamline Health, Safety, Security, and Environment ("HSSE") procedures, consolidating them into 14 Standards: i) Safety & Security Leadership; ii) Risk Management; iii) Life-Saving Rules; iv) Operating Procedures & Safe Practices; v) Safe Control of Work; vi) Security; vii) Drive Safe; viii) Crisis Management & Emergency Response; ix) Management of Change; x) Occupational Health; xi) Environment; xii) HSSE Contractor Management; xiii) Workforce Engagement; xiv) HSSE Compliance & Assurance. The SMS sets operational requirements and drives continuous improvement through a Plan-Do-Check-Improve cycle, with all documents centralized in an online platform for easy access and regular review.

#### 4.2.b.i Child Labor

The Companies do not employ workers under the age of 18. Age verification is a standard part of the recruitment process.

#### 4.2.b.ii Forced Labor

There is no evidence of forced labor within CDC or CGL operations. Furthermore, the Companies' procurement and contractor management procedures require all third-party employers to comply with labor standards and prohibit forced labor.

#### 4.2.c Occupational Health and Safety

The organization has established comprehensive safety programs to promote hazard identification, mitigation and reporting. Behavior-based safety initiatives include the UC-UB Safety Observation Program ("USeeUBeSafe") and the Health & Environment Safety Application, enabling workers to report unsafe conditions and behaviors. Employees, including contractors, are encouraged to raise concerns during departmental meetings, toolbox talks, HSE Committee sessions, or directly with supervisors. A "Refusal to Work" policy is in place, which protects workers from reprisals for declining to perform unsafe tasks.

Responding to the relatively high risk environment in the glassworks factory, a series of OHS policies and procedures have been developed specifically for that facility, including: i) the HSE Policy Statement; ii) the Induction and Training Program; iii) the Accident Incident Reporting, Investigation & Analysis Policy; iv) the Personal Protective Equipment Policy; v) the Procedure for Safety Eye Protection; vi) the Hearing Conservation Program; vii) the Return to Work Policy; viii) the Drive Safe Procedure; ix) the Warehouse Safety Policy; x) the Emergency Response Evacuation Incident and System Food Safety Emergency Response; xi) the Fire Prevention Policy; xii) the General Housekeeping Policy; xiii) the Occupational Health and Hygiene Control; xiv) the Environmental Management Program; xv) the Risk Management Policy and Procedure; xvi) the Management of Change Procedure; xvii) the Contractor HSE Selection and Management; xviii) the Scaffolding Procedure; xix) the Working at Height Procedure; xx) the Lifting Operations and Lifting Equipment Policy; xxi) the Procedure for Electronic Portable Equipment; xxii) the Workforce Engagement Program; xxiii) the Life-Saving Rules; and xxiv) the Safety Procedures.

The Companies will complement these documents with the following: i) a Dust Management and Control Plan for reducing dust in CGL's raw materials handling, storage, batch mixing and feed processes; ii) a Worker Hydration Program covering the entire Compound but with an extra focus on the Hot End of the glassworks; and iii) a comprehensive set of EHS documents prepared for the Trinidad operations of CDC, comparable to those already prepared for CGL.

#### 4.2.d Provisions for People with Disabilities

ANSA McAL HR policies and procedures ensure compliance with the labor laws of Trinidad and Tobago, including the Equal Opportunity Act, which prohibits discrimination against persons with disabilities. The Companies will develop and implement an Accessibility Action Plan for improving

accessibility for person with disabilities in office and publicly accessible spaces, and design the new infrastructure financed as part of this Project to be aligned with the principles of universal access.

#### 4.2.e Workers Engaged by Third Parties

Fixed-term and casual workers are covered by the terms and conditions of the Collective Labor Agreement, which require compliance with the Companies' HSE and HR policies and rules. Tender documents for external contractors specify that the Companies reserve the right to halt or terminate the work of any contracted worker for safety violations or any type of willful misconduct.

#### 4.2.f Supply Chain

The Group classifies vendors into "A" and "B" classes. Vendors rated "A" are those with significant consumer impact, high product usage, or financial relevance. A-class vendors undergo annual audits and must provide updated sustainability reports and relevant certifications (e.g., SA 8000 or equivalent).<sup>1</sup> In 2025, the Group plans to review B-class suppliers to assess ESG alignment and strengthen partnerships with responsible vendors.

### 4.3 Resource Efficiency and Pollution Prevention

#### 4.3.a Resource Efficiency

##### 4.3.a.i Greenhouse Gases

The Companies have developed a comprehensive greenhouse gas ("GHG") inventory for CGL in line with the GHG Protocol standard. Total GHG emissions (Scopes 1, 2, and 3) were 170,604 metric tonnes ("MT") CO<sub>2</sub>e as of 2023. Scope 1 emissions (direct, from owned/controlled sources) in 2021 totaled approximately 48,183 MT CO<sub>2</sub>e, primarily from natural gas combustion (stationary sources, including the two glass furnaces), diesel and gasoline use in vehicles and equipment, and refrigerant leakage. Scope 2 emissions (indirect, from purchased electricity) in 2021 were 16,447 MT CO<sub>2</sub>e, based on 33,398,011 kWh of electricity consumed at the Carib Glassworks Compound and other facilities, using a location-based emission factor for Trinidad and Tobago. Scope 3 emissions (indirect, from the value chain), measured in 2023, were 105,974 MT CO<sub>2</sub>e. Major contributors to Scope 3 emissions included: purchased goods and services (mainly from raw materials such as sand, soda ash, limestone, alumina, and packaging); fuel- and energy-related activities (reflecting upstream emissions from fuel and electricity procurement.); upstream transportation and distribution (from the shipment of raw materials and cullet by truck and ocean freight); downstream transportation and distribution (from product distribution to customers and export markets); and employee commuting (from employee home-to-work travel distances).

To reduce their GHG footprints, the Companies have taken or plan to take the following initiatives: i) automation of refrigeration and ammonia systems; ii) replacement of condensers, compressors,

---

<sup>1</sup> SA 8000 is a globally recognized social certification standard for workplaces, developed by Social Accountability International (SAI) in 1997. It sets requirements for organizations to demonstrate their commitment to fair and decent working conditions, integrating social accountability into their management systems.

and boilers with higher-efficiency models; iii) installation of Beer Membrane Filters to reduce filtration-related energy requirements; iv) LED lighting retrofits; v) expansion of CO<sub>2</sub> recovery from Bright Beer Tanks; and vi) increasing the amount of cullet in the raw material mix, which proportionally and significantly decreases the amount of GHG produced. The Companies will develop and implement a Refrigerant Transition Plan to phase out their use of high Global Warming Potential refrigerants (e.g., R134A, R410A, and R22).

The transaction is considered aligned with the mitigation goals of the Paris Agreement following a detailed assessment in accordance with the Joint MDB Methodological Principles. The detailed assessment considered the transaction against five specific assessment criteria including the national and local policy context, sectorial decarbonization pathways, an analysis of alternatives and stranded asset/transition risks in the national/sectorial context.

#### 4.3.a.ii Water Consumption

Operations at the Compound draw water from the municipal supply and an on-site, licensed well. The Companies monitor effluent continuously, discharging in the range of 1,200–2,400 m<sup>3</sup>/day as measured by inline systems and reported to the EMA. A major water efficiency and circularity initiative underway is the development of a new Water Reclamation Facility to treat all liquid effluents generated at the Compound and make a significant portion available for re-use. Complementary improvements include full replacement of incoming municipal and reservoir mains to eliminate leaks.

#### 4.3.b Pollution Prevention

CGL operates the only glass recycling plant in the English-speaking Caribbean, collecting glass locally for reuse as cullet in new bottle manufacturing. In 2024, 26,010 MT of recycled glass were used, alongside 705 MT of plastic regrind for crate production, with crates averaging 48% recycled content. Modernization efforts aimed at preventing pollution include a sustainable beer filtration system installed in 2023, which reduces waste by eliminating filtration powders and improving operational efficiency. As part of the refurbishing of the glassworks furnace, CGL will design the furnace to comply with IFC EHS Guideline limits for emissions of NO<sub>x</sub> and SO<sub>x</sub>.<sup>2</sup> CGL is also committed to installing equipment to continuously monitor the emissions of NO<sub>x</sub>, SO<sub>x</sub> and particulates during furnace operation and will develop an Air Quality Management and Monitoring Plan accordingly.

#### 4.3.b.i Wastes

CDC and CGL manage domestic and industrial waste streams through documented procedures and contractor oversight. Recyclable waste is segregated (glass, plastics, paper and cardboard). Hazardous waste (consisting primarily of used oil, grease and solvents) is removed for disposal by providers registered under the EMA Waste Management Rules (2021), which require chain of custody documentation to track waste to final destination. The Companies maintain contractor certifications and disposal records, with chain of custody forms and monthly summaries archived. CGL implements initiatives to reduce raw material losses (e.g., improved scraper systems in the

---

<sup>2</sup> <https://www.ifc.org/content/dam/ifc/doc/2000/2007-glass-manufacturing-ehs-guidelines-en.pdf>

batch house) and to increase cullet recycling internally. For brewery operations, waste minimization is supported by Group HSE Policy Manual procedures and OHS/facilities risk assessments, which incorporate housekeeping, segregation, and labeling, into operating controls.

#### 4.3.b.ii Hazardous Materials Management

Hazardous materials (e.g., maintenance oils/greases, cleaning chemicals, rodenticides) are controlled under the Group HSE Policy Manual, and the Approved Chemical List. The Companies require hazardous waste removal to be carried out by licensed contractors, keep Safety Data Sheets (“SDSs”) for approved chemicals, and train personnel in storage/handling and emergency response.

#### 4.3.b.iii Pesticide Use and Management

The Group HSE Manual outlines the overall pest management policy, which prioritizes good housekeeping (food protection, spill cleanup, waste management, water control, and facility maintenance). Non-chemical controls include physical barriers, exclusion, and trapping. Chemical pesticides are only used when necessary and with strict attention to human and environmental safety. If internal measures are inadequate, certified contractors are engaged and required to provide Material Safety Data Sheets for all chemicals. The Glassworks Pest Control Program provides additional operational procedures for pest control at the glassworks factory, including inspection, monitoring and contractor engagement protocols. Furthermore, CDC and CGL each has an Approved Chemical List that includes the list of pesticides approved for use at each of the Companies. None of the pesticides on the lists is classified by the WHO as Class 1a or 1b.

### **4.4 Community Health, Safety and Security**

#### 4.4.a Community Health and Safety

Risks to community health and safety from the operation are expected to be limited, given that all works and operations occur inside the Compound and do not extend into residential areas or sensitive receptors.

##### 4.4.a.i Infrastructure and Equipment Design and Safety

The new warehouse and office space will be designed and constructed by competent professionals and duly approved by competent authorities and professionals.

##### 4.4.a.ii Hazardous Materials Management and Safety

All hazardous materials are stored safely on the CDC/CGL compound and managed according to the Group HSE Policy Manual and therefore do not pose a risk to the neighboring community.

#### 4.4.a.iii Ecosystem Services

Direct dependency on or impacts to ecosystem services are negligible due to the industrial setting and internalized water management system at the compound.

#### 4.4.a.iv Community Exposure to Disease

No increased disease transmission risk is anticipated. Hygiene and sanitation practices are embedded in the Group HSE Policy Manual and FSSC 22000 food safety system, and vector control is managed through the Glassworks Pest Control Program.

#### 4.4.a.v Emergency Preparedness and Response

The Emergency Response Plan (“ERP”) establishes protocols for collaboration with local agencies, including the Trinidad and Tobago Fire Service (“TTFS”), Trinidad and Tobago Police Service (“TTPS”), Office of Disaster Preparedness and Management (“ODPM”), and Trinidad and Tobago Emergency Mutual Aid Scheme (“TTEMAS”), as well as affected communities. The plan mandates notifying and coordinating with neighboring businesses and residents and actively supporting evacuation and response when external capacity is limited. It details roles for internal teams and external responders, ensuring unified command and effective communication.

#### 4.4.b Security Personnel

Recent security transformation initiatives taken by the Group have significantly strengthened the organization's overall security posture and long-term sustainability. Key actions include modernization and integration of access control systems, the expansion of digital and physical security infrastructure and the rollout of comprehensive third-party and enterprise-wide security risk assessments. In alignment with Group's Security Procedures annual risk evaluations, enhanced due-diligence screening for security providers and new hires, and structured staff training programs have been implemented to improve operational readiness and resilience. These improvements are underpinned by strict compliance with applicable legislation, international standards and emerging best practices, ensuring a more robust, accountable, and future-ready security management framework for CDC and CGL.

The Companies will develop a Security Management Plan consistent with international good practice, to include: hiring standards; vetting procedures; rules of conduct; expectations regarding proportional use of force, provisions for training on appropriate behavior toward workers and communities; equipment standards; supervision protocols; and incident investigation procedures.

### **4.5 Land Acquisition and Involuntary Resettlement**

The operation does not involve any land acquisition or involuntary resettlement.

#### **4.6 Biodiversity Conservation and Natural Habitats**

The CGL sand quarry is located in lower Matura on a 21-hectare parcel of state-owned land, which ANSA McAL has leased since 1951 to supply silica for its glass factory. Approximately 12 hectares of the area have been directly disturbed, with the rest remaining under varying degrees of forest cover. The surrounding forest is significantly fragmented by other quarries, human settlements, and connecting roads.

From 2019 to 2022, CGL partnered with the EMA to carry out a demonstration rehabilitation program with support from IWEco.<sup>3</sup> The project was executed in two phases: phase 1 established a 1-hectare demonstration site, focusing on planting mixed forest species, installing Vetiver grass for slope stabilization, and constructing live check dams to control erosion; phase 2 expanded the restoration, adding more plants, improving soil quality with amendments, and extending plantings. In total, 1,523 trees were planted across 1.6 hectares. In 2024, volunteers from ANSA McAL and the surrounding community replanted an additional 763 native trees across almost three more hectares. In total, between 2019 and 2024, CGL has reforested 7.8 hectares, or 19.27 acres, of the approximately 12 hectares disturbed by the mining operation to date. Incorporating lessons learned from these experiences, CGL will develop and implement a Biodiversity Management and Monitoring Plan for the quarry, with the aim of rehabilitating disturbed areas and enhancing local biodiversity over time, 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.

#### **4.7 Indigenous Peoples**

The Project will not affect communities or groups of Indigenous Peoples.

#### **4.8 Cultural Heritage**

No impacts on cultural heritage are expected from the Project.

### **5. Local Access of Project Documentation**

For inquiries related to the Project, please contact: Frances Bain-Cumberbatch, Chief Legal & External Affairs Officer, ANSA McAL Limited, [frances.bain-cumberbatch@ansamcal.com](mailto:frances.bain-cumberbatch@ansamcal.com)

---

<sup>3</sup> Integrating Water, Land and Ecosystems Management in Caribbean Small Island Developing States—an initiative funded by the Global Environment Facility and implemented by the United Nations Environment Programme.