

ENVIRONMENT AND SOCIAL ACTION PLAN (ESAP)
FE INDORAMA AGRO LLC (INDORAMA AGRO)
September 2024

ESAP No.	ESAP item	Environmental and Social Risk (Liability/Benefits)	Requirements (Legislative, EBRD PR, IFC PS, Best Practice)	Resources	Timetable	Completion Indicator	Current Status
PS1/PR1: Assessment and Management of Environment and Social Risks and Impacts							
1.1	Retain a qualified and experienced team of experts, to undertake independent, semi-annual external monitoring to assess the performance of mitigation measures and to identify the need for additional or modified mitigation measures that may be necessary to meet the requirements of the environmental and social management plan (ESMP – see 1.3 below) and the ESAP. The expert will be selected by the Company in concurrence with EBRD and IFC and report directly to both the borrower and the Lenders. Lenders will provide ToR for the scope of work for independent E&S monitoring consultant.	Monitoring of EHSS risks and impacts Improved EHSS management	EBRD PR1 IFC PS1	Company resources Independent EHSS consultant	Mobilized 3 months post signing and initial desk review within a month of mobilization. First site visit during cotton harvest in 2021 (September October 2021). Submission of site visit report by November 2021. Semiannually over the first 2 years thereafter. Annually starting 2024.	EHSS consultant identified and approved by Senior Lenders. Monitoring visits by EHSS consultant completed and reports shared and reviewed by Senior Lenders.	Site visits for E&S monitoring completed in June and October 2022, and June 2023. A new EHSS consultant has been hired in June 2024 to conduct a) independent E&S monitoring visits twice a year and b) replace the previous E&S monitoring consultant. The next independent E&S monitoring site visit is being scheduled for Q3 2024. Complete.
1.2	Fully develop and implement an integrated environmental and social management system (ESMS) in line with EBRD PR/IFC PS requirements for the	Systematic management of EHSS impacts	EBRD PR1 IFC PS1 Best practice	Company resources Assign responsibilities	Prior to first disbursement	ESMS framework which identifies all the existing and planned EHSS policies, procedures	External ISO 14001 and ISO 45000 certification was obtained in May 2023.

ENVIRONMENT AND SOCIAL ACTION PLAN (ESAP)
FE INDORAMA AGRO LLC (INDORAMA AGRO)
September 2024

	<p>operational phase. The system shall include all relevant EHSS policies, procedures, and resources to ensure appropriate identification, mitigation, monitoring and reporting of environmental and social issues associated with the Project.</p> <p>Integrate consideration of occupational health and safety and labour issues into the ESMS to ensure that environmental, social, labour, and health and safety issues are considered in an integrated manner.</p> <p>The ESMS should be aligned with international best practice such as ISO 14001 and ISO 45001.</p>				<p>July 2022</p>	<p>and resources required.</p> <p>Full EHSS management system in place and implemented by July 2022.</p> <p>Full list of system documents and sample procedures provided to the Senior Lenders.</p>	<p>The IESC will verify the EHSS management system and its implementation in Q3, 2024.</p> <p>Delayed.</p>
1.3	<p>Develop the complete set of management plans, listed in the ESIA Vol III ESMP, to the satisfaction of all the Lenders. Operational ESMPs (O- ESMPs) will include technical requirements and monitoring procedures for both direct farms and contracted farms, as well as clear designation of roles and responsibilities in the organizational structure.</p> <p>Monitor the implementation of construction ESMPs (C-ESMPs) by contractors.</p>	<p>Management and monitoring of environmental, social, health and safety issues through implementation of appropriate management and monitoring plans.</p>	<p>EBRD PR1 IFC PS1 Best practice</p>	<p>Company resources</p> <p>External consultants, if required</p> <p>Assign responsibilities</p>	<p>May 2021 (C-ESMPs)</p> <p>Aug 2021 (O-ESMPs)</p>	<p>Fully developed C-ESMPs and O-ESMPs received, reviewed, and approved by lenders.</p> <p>August 2021 (O-ESMPs)</p>	<p>The IESC will verify the adequacy of core EHSS management plans and their level of implementation in the fourth E&S monitoring site visit in Q3 2024.</p> <p>Complete and ongoing monitoring.</p>

**ENVIRONMENT AND SOCIAL ACTION PLAN (ESAP)
FE INDORAMA AGRO LLC (INDORAMA AGRO)
September 2024**

	Implement and maintain such plans for the life of the Project.						
1.4	Establish a centralized commitment register and performance tracking system to track the progress and implementation performance of all ESMPs.	Monitoring of EHSS risks and impacts Improved EHSS management.	EBRD PR1 IFC PS1	Company resources	September 2021	Commitment register and tracking system received and approved by EBRD and IFC.	The Centralized Commitment Register (CCR) is being updated. The implementation of the Commitment Register (CCR) will be verified in the fourth E&S monitoring site visit in Q3 2024. Complete and ongoing monitoring.
1.5	Establish a dedicated E&S department with adequate resources to oversee development and implementation of the ESMS and ESMPs. The department should include an experienced Stakeholder relations and communications manager to ensure proactive engagement with impacted and interested stakeholders. Provide clear roles and responsibilities and job descriptions for each of the E&S positions.	Implementation of the environmental, social, health and safety management systems.	EBRD PR1 IFC PS1	Company resources	July 2021	EHS manager and direct reports appointed to the Project. Stakeholder relations and communications manager appointed to the Project.	HSE merged with the ESG department in Q4 2023. HSE Coordinators hired for each region in Q1 2024. A CLO hired in Kashkadarya for contract farming in November 2023. A CSO Coordinator hired in October 2023. A new ESG Head joined in March 2024. A Grievance Redress Mechanism Manager hired in March 2024. An LRP coordinator hired in April 2024 Complete and ongoing monitoring.
1.6	Undertake in-depth gender- based violence and harassment assessment to identify risks to workers in the workplace and	Prevention and mitigation of gender-based violence	EBRD PR1/PR2/PR4 IFC PS1/PS2/PS4	Indorama Agro Expert consultant	August 2021	Assessment report shared and agreed with EBRD and IFC.	A GBVH audit firm has been hired to conduct the GBVH assessment in combination with the CHSS assessment. Inception report

**ENVIRONMENT AND SOCIAL ACTION PLAN (ESAP)
FE INDORAMA AGRO LLC (INDORAMA AGRO)
September 2024**

	communities interacting with project workers in relation with the project and develop prevention and mitigation measures. As required, develop policies and procedures on gender-based violence, sexual harassment, and discrimination for the workforce in the workplace and communities interacting with project workers in relation with the project as per action items 2.1 and 4.1. Build capacity and provide training to EHSS and human resources staff to implement these policies and procedures in a safe manner. Provide training to all staff, contractors, and contract farmers on code of conduct and GBVH prevention.				September 2021 January 2022 Ongoing monitoring	Policies and procedures shared and agreed with EBRD and IFC. Report on training shared with EBRD and IFC. Reports of GBVH incidents and allegations provided to EBRD and IFC in safe and confidential manner.	received. Assessment to be finalized in Q4 2024. Ongoing.
PS2/PR2: Labor and Working Conditions							
2.1	Formalize Indorama Agro's approach to the prevention and mitigation of Gender- Based Violence and Harassment (GBVH) in policy provisions and procedures and articulate the requirements in the Human Resources policy. Publicize the requirements to all Indorama Agro workers, and work with contract farmers to develop their own requirements in line with Indorama's standards. Ensure the worker grievance mechanism is accessible to all	Minimise risks related to GBVH for the Company, its workers, and contractors	EBRD PR2 IFC PS2	Company resources	September 2021 December 2021 January 2022	Policy received, reviewed, and approved by the Senior Lenders. Enhanced grievance mechanism to safely receive workplace reports of GBVH. Implementation of capacity building; record keeping of training carried out.	Policy and procedures developed. Policy disclosed on IAL website. Complete.

ENVIRONMENT AND SOCIAL ACTION PLAN (ESAP)
FE INDORAMA AGRO LLC (INDORAMA AGRO)
September 2024

	direct workers, as well as contract farm workers, and is equipped to handle reports of GBVH in a safe and confidential manner. Deliver capacity building and training to key human resources personnel.						
2.2	Introduce gender-responsive human resources policies and practices at the company level to improve employment outcomes for women workers. In this context, develop a clear action plan and roadmap to reach a female employment share on best effort basis of at least 25% within the company within five years of the start of operations (with an ultimate commitment to each 45% over the longer term, on best effort basis, through tangible measures including introducing gender-responsive recruitment and retention policies and practices in line with international best practices; addressing female employees' affordable childcare needs; engaging brigade leaders and agronomists to help stimulate hiring of women farm workers; and collecting gender-disaggregated data on key recruitment, retention and job progression outcomes to improve monitoring and guide decision-making.	Increase participation of female employees in the workforce	EBRD PR2 IFC PS2	Company Resources	April 2022 September 2024	Action plan and roadmap received, reviewed, and approved by the Senior Lenders. Reach 25% of female employment share on best effort basis.	The Equal Opportunity Assessment was completed in May 2022. Monthly monitoring of the agreed Gender Action Plan implementation activities from March – Nov 2023. Training activities related to Gender Action Plan is ongoing from November 2023 to July 2024. Ongoing monitoring.

ENVIRONMENT AND SOCIAL ACTION PLAN (ESAP)
FE INDORAMA AGRO LLC (INDORAMA AGRO)
September 2024

2.3	Develop Harassment-Free and Respectful Workplace policy and procedure and provide training to all employees.	Prompt handling of improper behavior	EBRD PR1/PR2 IFC PS2	Company Resources	July 2021	Policy received, reviewed, and approved by the Lenders. Implementation responsibilities assigned, and training provided across all operations. Training records provided to EBRD and IFC.	Policy disclosed at IAL website. Procedure is available. Internal trainings conducted and ongoing per the 2024 calendar. Complete.
2.4	The updated HR policy will be communicated widely to workers, including the right to join multiple workers' organizations of their choosing, and steps will be taken to train all relevant managers on Freedom of Association and Collective Bargaining (FACB) rights with a view of developing a climate of mutual understanding and constructive engagement.	Ensure FACB rights are respected	EBRD PR2 IFC PS2 Uzbek Law on Trade Unions (2019)	Company Resources	September 2021	Training provided across all operations. Training records provided to EBRD and IFC.	Training conducted in 2023 and ongoing. Training provided to all new joiners - permanent employees, term employees, contractors, seasonal workers. Complete.
2.5	Conduct a labour assessment covering Indorama's workforce at directly operated cotton farms and cotton gins. Lenders to approve on the ToR and consultants. Based on the labour assessment findings if needed develop a corrective action plan with deadlines and dedicated resources to address all findings.	Appropriate management of labour standards for direct employees	EBRD PR2/PR4 IFC PS2 Uzbek Labour Laws ISO 45001	Company Resources	September 2021 November 2021	Labour assessment provided to Senior Lenders for approval. Corrective action plan approved by Lenders.	The first labour assessment completed, and the October 2022 Corrective Action Plan disclosed and implemented. Second labor assessment field work has been completed by the third-party assessor. The final report and corrective action plan is in progress.

ENVIRONMENT AND SOCIAL ACTION PLAN (ESAP)
FE INDORAMA AGRO LLC (INDORAMA AGRO)
September 2024

							Complete and ongoing monitoring.
2.6	<p>Develop and implement a monitoring system to assess the labour conditions of contract workers in contract farms during harvesting, including but not limited to, forced and child labour, and hours worked by contract farm workers.</p> <p>Provide guidance and orientation to contract farmers to follow required labour standards on contract farms and carry out regular monitoring of working conditions of both permanent workers and seasonal workers.</p>	Appropriate management of labour standards on contract farms	EBRD PR2 IFC PS2	Company Resources	June 2021 2021 cotton harvest	<p>Monitoring system reviewed and approved by lenders.</p> <p>Verified by independent monitoring (e.g., through independent NGOs, the ILO TPM/Decent Work programme, etc.)</p>	<p>Contract Farming Monitoring System to assess the labor conditions was developed and carried out by the Company over the harvest seasons in 2022 and 2023.</p> <p>The Government has changed its policy for contract farming in 2024. Currently contract farming monitoring under review.</p> <p>Complete and ongoing monitoring.</p>
PS3/PR3: Resource Efficiency and Pollution Prevention and Control							
3.1	<p>1. a) Promote efficient and sustainable use of agricultural water in the project's four districts through follow-up on the results of the water supply and use during previous irrigation seasons, and the baseline findings of the Water Balance Study notably in areas of water shortage.</p> <p>b) Ensure ongoing monitoring and metering of its water requirements for directly managed farms.</p>	Efficient use of irrigation water and implementation of sustainable water resources management plan	EBRD PR3 IFC PS3	<p>Company resources (Indorama Irrigation team)</p> <p>Independent Irrigation and Water Resources Management consultant as required.</p>	1.a) By end September 2021.	<p>1.a) Water Resources Management Action Plan- (with a timeline for action items) developed based on results and available data from irrigation seasons (2020-2021) taking into consideration baseline findings of Water Balance Model and its recommendations.</p>	<p>Water Resources Management Plan – please refer to ESAP action 1.3 status.</p> <p>Complete and ongoing monitoring.</p>

**ENVIRONMENT AND SOCIAL ACTION PLAN (ESAP)
FE INDORAMA AGRO LLC (INDORAMA AGRO)
September 2024**

					<p>1.b) Starting September 2021 and ongoing.</p> <p>1.c) September 2021 and ongoing</p>	<p>1.b) Implementation of Water Resources Management Action Plan across Indorama's agricultural lands currently under production including adaptation measures in areas of water shortages.</p> <p>1.c) Monitoring records of water supply (by government) and use (by Indorama) in four districts are submitted on a periodical basis starting with operational subdistricts /completed redevelopment.</p>	
	<p>2. Continue to engage with different stakeholders through the existing Water Consumer Associations (WCA) including government and water users. In coordination with the Ministry of Water Resources and the existing WCA, Indorama Agro shall establish and implement a Water Stewardship Program to ensure allocation of sufficient water</p>				<p>2.a) By end September 2021</p>	<p>2.a) Water Stewardship Program is developed in consultation with relevant stakeholders including Ministry of Water Resources, WCA and other users in project area.</p>	<p>Water Resources Management Program developed in October 2022.</p> <p>a) Adoption of Efficient Irrigation Practices b) Laser guided land levelling c) Installed 4 rubicon metres for water consumption monitoring d) Implementation of drip irrigation</p>

**ENVIRONMENT AND SOCIAL ACTION PLAN (ESAP)
FE INDORAMA AGRO LLC (INDORAMA AGRO)
September 2024**

	<p>resources without compromising access by other users in all districts. This program will be based on findings of the Water Balance Model and the ongoing monitoring of water distribution for the agricultural operations.</p>				<p>2.b) Starting September 2021 and ongoing.</p> <p>2.c) Starting September 2021 and ongoing.</p>	<p>2.b) Water Stewardship Program is implemented, across Indorama's agricultural lands currently under production, including relevant stakeholders (Ministry of Water Resources and other water users in project areas).</p> <p>2.c) Indorama Agro to submit meeting records and action items relevant to different Water Consumer Associations across four districts covering Indorama Agro project areas, addressing two priority issues; (i) Reliability and volume of releases from government delivery channels, and (ii) Transmission losses between the main canals and field.</p>	<p>Complete and ongoing monitoring.</p>
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ENVIRONMENT AND SOCIAL ACTION PLAN (ESAP)
FE INDORAMA AGRO LLC (INDORAMA AGRO)
September 2024

	3. Check quality of water consumed for drinking and domestic uses in the Project premises, and if necessary treat in line with WHO drinking water standards.				3. Starting December 2021 and ongoing (to be completed before facilities become operational)	3. Results of drinking water quality tests in line with WHO standards. Treatment facility established if needed.	Monitoring of consumed water done and results shared in Q1 2023. Complete and ongoing monitoring.
3.2	Drainage: Introduce strict instructions on preparation of fertilizers, pesticides, and other agrochemicals solutions. Undertake accurate identification of crops needs.	Prevent negative impacts from water drainage	EBRD PR3 IFC PS3	Company resources	December 2021	Training provided to Indorama Agro staff handling agrochemicals material including application and drainage limits, including monitoring records.	SOPs developed. ILO Online self paced training on Chemical Risk in Agricultural Sector completed by 30 IAL staff comprising production, HSE & ESG dept. Complete and ongoing monitoring.
3.3	Wastewater: Follow good international industry practice (GIIP), as set out in the IFC EHS Guidelines to ensure sanitary and industrial wastewater discharges are compliant with IFC's requirements, as the minimum level of mitigation in the absence of national legislation or applicable international guidance.	Prevent negative impacts from waste water discharges	EBRD PR3 IFC PS3	Company resources	December 2021	Wastewater monitoring records in line with IFC EHS guidelines.	As per national requirement, it is not compulsory to conduct this monitoring if a facility is not connected to canal system and septic tank is available in the facility. A contract for domestic wastewater disposal is available. Complete and ongoing monitoring.
3.4	Agrochemicals Use and Management: Amend existing Agro- pesticide Management Policy and Integrated Pest Management to: 1. Develop a screening procedure, as part of the management plan for agrochemicals/pesticides, to	Prevent negative impacts from pesticide use	EBRD PR3 IFC PS3	Company resources	December 2021	Plan for the management of agrochemicals/pesticides storage and use, including screening procedure.	Pesticides, Defoliants, & Fertilizers Management Plan completed.

ENVIRONMENT AND SOCIAL ACTION PLAN (ESAP)
FE INDORAMA AGRO LLC (INDORAMA AGRO)
September 2024

	<p>regularly review active ingredients in use against WHO and EU databases to identify plant protection products that are classified as extremely or highly hazardous, or subject to phase-out or ban. In such cases, Indorama Agro will seek legally approved alternatives and utilize in accordance with the management plan for agrochemicals/pesticides.</p> <p>2. Avoid soil contamination, Indorama Agro shall (i) store hazardous materials in a manner that prevent leaks and spills with adequate bunding provided for all fuel and chemicals storage; (ii) fertilizers and pesticides solutions will be prepared in application machinery tanks or at a dedicated site with impermeable paving and a drainage system.</p> <p>3. Develop an Emergency Action Plan to respond to accidental discharge of petroleum products, pesticides and other agrochemicals into soil, drainage collectors and irrigation canals.</p>				December 2021	Storage and Emergency Action Plan for accidental discharge of agrochemicals.	<p>The Emergency Preparedness and Response Plan was finalized in November 2023.</p> <p>Complete and ongoing monitoring.</p>
PS4/PR4: Community Health, Safety, and Security:							
4.1	<p>Undertake detailed assessment of potential community health and safety risks and impacts and develop a Community Health and Safety Management Plan covering, as necessary, issues including (but not limited to):</p>	<p>Prevent or address any adverse impacts on the health and wellbeing of local communities</p>	<p>EBRD PR4 IFC PS4</p>	<p>Company Resources</p> <p>Independent EHSS consultant as required</p>	August 2021	<p>Community health and safety management plan reviewed by and agreed with EBRD and IFC.</p>	<p>Community Health and Safety assessment is underway (see also item 1.6). A combined GBVH and CHS assessment will be undertaken by a third party. Expected to be finalized in Q4 2024.</p>

**ENVIRONMENT AND SOCIAL ACTION PLAN (ESAP)
FE INDORAMA AGRO LLC (INDORAMA AGRO)
September 2024**

	<ul style="list-style-type: none"> - Expatriate worker accommodation - Transportation, storage and use of agrochemicals and other hazardous substances - Use of security guards - Road safety measures pertaining to movement of Project Vehicles. <p>Lenders will review and approve the ToR for the assessment.</p>						Ongoing.
PS5/PR5: Land Acquisition and Involuntary Resettlement:							
5.1	<p>Hire a senior international resettlement specialist to extrapolate baseline information, aiming to:</p> <ol style="list-style-type: none"> 1) establish a profile of the previous cotton farm leasers, including name, age, land areas, and current livelihood status (to the extent they are traceable and data on livelihood are available); 2) establish a profile of the farm workers on the Project, include numbers, earning levels and livelihood post the land acquisition; 3) identify and map the dimension of impacts on those farm workers and former land leasers to the extent there is reliable data available on them; 4) develop a Livelihood Restoration Plan (LRP) to mitigate 	Livelihood restoration	EBRD PR5 IFC PS5	Indorama Agro Senior international resettlement expert	July 2021 September 2021	International resettlement expert selected by IFC and EBRD and hired by Indorama Agro. Livelihood restoration plan developed, reviewed and approved by Lenders.	LRP finalized and agreed version (in English & Uzbek) has been uploaded to the IAL website in May 2024 & July 2024, respectively. <b style="color: green;">Complete and under implementation.

**ENVIRONMENT AND SOCIAL ACTION PLAN (ESAP)
FE INDORAMA AGRO LLC (INDORAMA AGRO)
September 2024**

	and address impacts identified to meet IFC's PS5 and EBRD's PR5 requirements on livelihood restoration with timeline, budget, and detailed monitoring plan. Indorama Agro will allocate adequate resources (including financial resources) to implement the livelihood restoration plan developed.						
5.2	Update the Community Asset Programme (CAP) with income generation programmes with concrete steps for implementation. Include a clear definition of beneficiaries to best possible extent and a monitoring program to assess impacts.	Provide additional benefits for affected communities	EBRD PR1/PR5 IFC PS1/PS5	Indorama Agro IFC Advisory Services	September 2021	Updated CAP received, reviewed, and approved by IFC and EBRD.	Updating the Community Asset Programme is expected to be finalized in Q3, 2024 Delayed.
5.3	Monitor implementation of LRP	Livelihood restoration	EBRD PR5 IFC PS5	Indorama Agro	Ongoing on a semi-annual basis; first report to be delivered by March 2022 (6 months after approval of LRP)	Monitoring reports submitted for review and approval by lenders.	Consultation with PAPs is being started. Implementation of LRP-will be completed within H1 2025. LRP Monitoring reports to be submitted on a quarterly basis. Delayed.
5.4	Evaluation by an independent resettlement expert of LRP implementation progress and completion.	Ensure livelihoods are restored	EBRD PR5 IFC PS5	Independent resettlement expert	June 2022 June 2026	Evaluation reports submitted for review and approval by lenders. Completion audit submitted for review and approval by lenders.	After the implementation of the livelihood options. Delayed.

ENVIRONMENT AND SOCIAL ACTION PLAN (ESAP)
FE INDORAMA AGRO LLC (INDORAMA AGRO)
September 2024

5.5	Update the land acquisition and livelihood restoration framework for future land acquisition.	Ensure future land acquisition is managed in line with Lenders' requirements	EBRD PR5 IFC PS5	Independent resettlement expert	January 2022	Land acquisition and livelihood restoration framework approved by Lenders.	After the LRP report is finalized, accepted by all parties, and disclosed. Delayed.
PS1/PR10: Information Disclosure and Stakeholder Engagement							
10.1	Recruitment of two female Community Liaison Officers (CLOs) reporting directly to the Company Director. Training of CLOs to have the competences to safely address any reports of gender-based violence and harassment.	Management/ monitoring of social risks	EBRD PR1/PR10 IFC PS1	Company resources	June 2021 September 2021	Evidence of hiring of two female CLOs. Training records shared.	A new CLO has been onboard since NOV 2023. In total 3 CLOs. IAL recruited two female and one male CLOs in 2024. Complete.
10.2	Undertake regular community consultations for the identification of environmental and social issues of concern to the communities and undertake targeted monitoring studies specifically designed to respond to these concerns as necessary and revert to respective communities.	Management/ monitoring of environmental and social risks Meaningful engagement of project affected communities.	EBRD PR1/PR10 IFC PS1	Company Resources Expert consultants as necessary	Consultation meetings starting in June 2021 and semi-annual thereafter	Development of time bound plan for the community consultation activities for review by the lenders Consultation reports shared with lenders	The Stakeholder Engagement Plan was disclosed in July 2023. The updated SEP will be disclosed by Q3, 2024. Complete and ongoing monitoring.
10.3	Review performance of existing community grievance mechanism and make the necessary improvements to ensure all grievances are received, recorded, and addressed promptly and effectively, without any reprisals to the complaining parties.	Timely and effective management of grievances	EBRD PR10 IFC PS1	Company Resources Expert consultants	a) Prior to first disbursement b) July 2021	a) ToR for third party review agreed with the Senior Lenders. b) Internal review of existing community grievance mechanism and necessary improvement	• 95% of registered complaints resolved till 31 Dec 2023 The GRM process effectiveness will be reviewed through the next E&S monitoring site visit in Q3 2024 Complete and ongoing monitoring.

**ENVIRONMENT AND SOCIAL ACTION PLAN (ESAP)
FE INDORAMA AGRO LLC (INDORAMA AGRO)
September 2024**

					c) August 2021	measures implemented. c) Third party review initiated, and plan/proposal shared and agreed with the Senior Lenders.	
10.4	Disclose annual E&S performance reports with a summary of key E&S impacts and risks, how they were mitigated and key indicators of E&S performance (including incidents, grievance resolution etc.) in a format accessible to stakeholders.	Meaningful engagement of project affected communities	EBRD PR10 IFC PS1	Company Resources	a) January 2022 b) April 2022	a) Scope of annual E&S disclosures agreed with the lenders. b) First annual E&S report made public on Company website and locally.	Annual E&S Performance Report 2023 to be finalized by Q3 2024. Delayed.