

ESAP No.	ESAP item	Environment and Social Risk (Liability benefits)	Requirements, legislative EBRD PR, IFC PS, Best Practice	Resources	Time Table	Completion Indicator	Status
<b>PS 1 Assessment and Management of Environment and Social Risks and Impacts</b>							
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 PR 1 IFC PS 1	Company resources Independent EHSS consultant	Mobilised 3 months post signing and initial desk review within a month of mobilisation. 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. EHSS consultant identified and approved by Senior Lenders. Monitoring visits by EHSS consultant completed and reports shared and reviewed by Senior Lenders. • Completed. • WSP appointed as E&S monitoring consultant in April 2022. • First site visits for E&S monitoring completed in June and October 2022. Independent monitoring will continue twice a year. No. Action Environment & Social Risk (Liability	EHSS consultant identified and approved by Senior Lenders.  Monitoring visits by EHSS consultant completed and reports shared and reviewed by Senior Lenders.	IESC consultant Lummus has been selected. Email agreement in place. Contract making as per Uzbekistan country format is in progress.  Lummus has agreed to be part of the next IFC EBRD E&S visit on 08 July.

1.2	<p>Fully develop and implement an integrated environmental and social management system (ESMS) in line with EBRD PR/IFC PS requirements for the 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. The ESMS should be aligned with international best practice such as ISO 14001 and ISO 45001.</p>	Systematic management of EHSS impacts Best Practice	EBRD PR 1 IFC PS 1 Best practice Assign responsibilities	Company resources	Prior to first disbursement July 2022 July 2022	ESMS framework which identifies all the existing and planned EHSS policies, procedures and resources required. Full EHSS management system in place and implemented by July 2022. Full list of system documents and sample procedures provided to the Senior Lenders.	WIP. All suggestions made on version 3.0 getting incorporated. Version 4.0 will be submitted to the Lenders on 14 June 2024.
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</p> <p>(C-ESMPs) by contractors. Monitor the implementation of construction ESMPs</p> <p>(C-ESMPs) by contractors.</p> <p>Implement and maintain such plans for the life of the Project.</p>	Management and monitoring of environmental, social, health and safety issues through implementation of appropriate management and monitoring plans.	EBRD PR 1 Best practice	Company resources Assign responsibilities	May 2021 Aug 2021	Fully developed C-ESMPs and O-ESMPs received, reviewed, and approved by lenders. August 2021 (O-ESMPs)	The ESMPs were submitted to the previous IESC consultants (WSP) for final approval. However, WSP was discontinued in the interim. The contract with the new IESC Consultant (Lummus) does not include the review of the ESMPs. Hence those ESMPs that are pending finalization (as per the above), will now be completed by the IAL ESG team by 30 June 2024.

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	Sept 2021	Commitment register and tracking system received and approved by EBRD and IFC.	The Centralized Commitment Register is a live document. We had shared version 2.0, and new comments were received. IAL will update the status of CCR version 3.0 by 30 June 2024. Going forward, it will be done once a year.
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 relation 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 PR 1 IFC PS 1	Company resources	July 2021	EHS manager and direct reports appointed to the Project. Stakeholder relations and communications manager appointed to the Project.	Completed
1.6	Undertake in-depth gender-based violence and harassment assessment to identify risks to workers in the workplace and 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.	Prevention and mitigation of gender-based violence	EBRD PR1, PR2 and PR4 IFC PS1, PS2 and PS4	Indorama Agro Expert consultant	Aug 2021 Sept 2021 Jan 2022 Ongoing monitoring	(Assessment report shared and agreed with EBRD and IFC). January 2022 (Reports of GBVH incidents and allegations provided to EBRD and IFC in safe and confidential manner). September 2021 (Policies and procedures shared and agreed with EBRD and IFC). Report on training shared with EBRD and IFC). 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.	AV Group has been selected for this work. Contracting as per Uzbek law is in progress.

2.1	<p>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 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.</p>	Minimise risks related to GBVH for the Company, its workers, and contractors	EBRD PR 2 IFC PS 2	Company resources	Sept 2021 Dec 2021 Jan 2022 Dec 2021	(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.	Ongoing
2.2	<p>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 reach 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.</p>	Increase participation of female employees in the workforce	EBRD PR 2 IFC PS 2	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.	Ongoing

2.3	Develop Harassment-Free and Respectful Workplace policy and procedure and provide training to all employees.	Prompt handling of improper behaviour	EBRD PR 1 EBRD PR 2 IFC PS 1	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.	Ongoing
2.4	The updated HR policy will be communicated widely to workers, including the right to join multiple workers' organisations 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 PR 2 IFC PS 2	Company Resources	Sept 2021	Training provided across all operations. Training records provided to EBRD and IFC.	Ongoing
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	Company Resources	Sept 2021 Nov 2021	Labour assessment provided to Senior Lenders for approval. Corrective action plan approved by Lenders.	Published Labour report version v1.0 with the lenders. Right now we are on Labour Report v2.0. Both IAL and Lenders have clarified their positions to NBT (the consultant). New document version 3.0 awaited. From draft to finalisation normally takes time, so IAL requested for extension up to 15 June, 2024.
2.6	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. 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.	Appropriate management of labour standards on contract farms	EBRD PR2 IFC PS 2	Company Resources	June 2021	Monitoring system reviewed and approved by lenders. Verified by independent monitoring (e.g., through independent NGOs, the ILO TPM/Decent Work programme, etc.)	Ongoing and will be assessed in July 2024.

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 PR 3 IFC PS 3	Company resources (Indorama Irrigation team) Independent Irrigation and Water Resources Management consultant as required.	<p>1.a) By end September 2021.</p> <p>1.b) Starting September 2021 and ongoing.</p> <p>1.c) September 2021 and ongoing</p> <p>2.a) By end September 2021</p> <p>2.a) By end September 2021</p> <p>2.a) Starting September 2021 and ongoing.</p> <p>3. Starting December 2021 and ongoing (to be completed before facilities become operational).</p>	<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>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.a) Water Stewardship Program is developed in consultation with relevant stakeholders including Ministry of Water Resources, WCA and other users in</p>	Water Stewardship Plan v2.0 was shared with the Lenders and WSP on 8 May 2023. This incorporated all comments and feedback from the lenders. Since feedback was not received, we assume it is closed.
3.2	<p>Drainage: Introduce strict instructions on preparation of fertilizers, pesticides, and other agrochemicals solutions. Undertake accurate identification of crops needs..</p>	Prevent negative impacts from water drainage	EBRD PR 3 IFC PS 3	Company resources	December 2021	Training provided to Indorama Agro staff handling agrochemicals material including application and drainage limits, including monitoring records.	Ongoing
3.3	<p>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.</p>	Prevent negative impacts from water drainage	EBRD PR 3 IFC PS 3	Company resources	December 2021	Wastewater monitoring records in line with IFC EHS guidelines.	Ongoing

3.4	<p>Agrochemicals Use and Management: Amend existing Agro- pesticide Management Policy and Integrated Pest Management to:</p> <p>1. Develop a screening procedure, as part of the management plan for agrochemicals/pesticides, to 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>	Prevent negative impacts from water drainage	EBRD PR 3 IFC PS 3	Company resources	December 2021	Plan for the management of agrochemicals/pesticides storage and use, including screening procedure. Storage and Emergency Action Plan for accidental discharge of agrochemicals.	The new chemical screening procedure is now included in the final version v4.0. It was then shared with the Lenders on 30 November 2023, and deemed closed.
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> <ul style="list-style-type: none"> <li>- Expatriate worker accommodation</li> <li>- Transportation, storage and use of agrochemicals and other hazardous substances</li> <li>- Use of security guards</li> <li>- Road safety measures pertaining to movement of Project Vehicles.</li> </ul> <p>Lenders will review and approve the ToR for the assessment.</p>	Prevent or address any adverse impacts on the health and wellbeing of	EBRD PR4 IFC PS4	Company Resources Independent EHSS	August 2021	(Community health and safety management plan reviewed by and agreed with EBRD and IFC).	See section 1.6 for details and status.

5.1	<p>Hire a senior international resettlement specialist to extrapolate baseline information, aiming to:</p> <p>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);</p> <p>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;</p> <p>4) develop a Livelihood Restoration Plan (LRP) to mitigate 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.</p>	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 approval by Senior Lenders).	LRP finalized and agreed version has been uploaded to the IAL website.
5.2	<p>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.</p>	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).	The Community Asset Programme v2.0 has been shared with the Lenders in 23 May 2024. Feedback has now been received. IAL is working on the feedback and will send the updated version on 31 July 2024.
5.3	Monitor implementation of LRP	Livelihood restoration	EBRD PR1 & PR5	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.	the IAL Livelihood Restoration Plan has been disclosed on the website on 31 May 2024. Consultation with the identified PAPs on the livelihood restoration options provided by IAL will start from the week of 3 June 2024.



5.4	Evaluation by an independent resettlement expert of LRP implementation progress and completion.	Ensure livelihoods are restored	EBRD PR5 IFC PS 5	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.	
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 PS 5	Independent resettlement expert	January 2022	Land acquisition and livelihood restoration framework approved by Lenders.	
<b>PS 6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>							
	1) BCI principles and criteria training and independent verification – Indorama Agro will prepare a Plan with detail of activities to expand full suite of BCI principles training to all existing and future contract farmers. 2) Indorama Agro will engage a third party to independently verify implementation of the full suite of BCI principles and criteria in both direct and contract farms. The third party independent verification activities will follow the Better Cotton Standard System assurance process. 3) BCI approved verification organisation will be hired. Terms of reference for its engagement will be drafted and agreed with IFC and EBRD. A work plan for verification that follows BCSS assurance process will also be prepared and agreed with IFC & EBRD.	Apply Good International Practice (GIP) to cotton farming.	IFC PS 6 EBRD PR 6 GIP	Indorama Agro Independent BCI auditor	July 2021 for items i to iii Item iv: August 2021 work plan for verification activities Ongoing external verification	i. Plan for training roll out agreed with IFC and EBRD. ii. Terms of reference for third party verification agreed with IFC and EBRD. iii. Third party verification organization appointed. iv. Work plan for verification activities agreed with IFC and EBRD.	IAL is currently working on capacity building of the 'Decent Work' criteria. We are taking the help of GIZ UZ for the same. The other six criterias are already certified up to 2025.
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 and PR10 IFC PS1	Company resources	June 2021 September 2021	(Evidence of hiring of two female CLOs). (Training records shared).	Completed
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 and 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	IAL has submitted version 4.2.1 of the SEP incorporating their suggestions on 30 May 2024.

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 c) Aug 2021	a) ToR for third party review agreed with the Senior Lenders. b) Internal review of existing community grievance mechanism and necessary improvement measures implemented. c) Third party review initiated, and plan/proposal shared and agreed with the Senior Lenders.	95% GRM resolved in 2023. We hope to maintain and improve that score in 2024.
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 2023	a) Scope of annual E&S disclosures agreed with the lenders. b) First annual E&S report made public on Company website and locally.	First draft of the E&S performance report 2023, will be shared with the Lenders on 30 June, 2024