

**UCB PROJECT: Supporting the growth of battery energy solutions in Brazil
Environmental and Social Action Plan (ESAP)**

No.	Aspect	Action	Deliverable	Delivery date
PS 1: Environmental and Social Risk and Impact Assessment and Management				
1.1	Environmental and Social Management System	1. Develop an Integrated Environmental Management System Manual for the Extrema Plant.	1. Integrated Environmental Management System Manual	1. Nine months after first disbursement.
		2. Implement the Integrated Environmental Management System in Extrema and Manaus.	2. Evidence of implementation of Integrated Environmental Management Systems.	2. Annually, as part of the Environmental and Social Compliance Report (ESCR).
1.2	Gender Risks	1. Develop Training Schedules and Initiatives for Awareness and Prevention of Sexual and Moral Harassment and Gender-Based Violence ("GBV") in Manaus and Extrema.	1. Training Schedules.	1. Four months after first disbursement.
		2. Implement activities according to the Training Schedules and Sexual and Moral Harassment and GBV Awareness-Raising and Prevention Initiatives.	2. Evidence of implementation.	2. Annually, as part of the ESCR.
		3. Update the General Procedure for the Ombudsman Channel to establish specific procedures for complaints and reports of moral and sexual harassment and GBV, including: i) definitions of conduct classified as harassment and GBV; ii) mechanisms to protect and assist potential victims; iii) creation of an Internal Committee to handle reports; and iv) procedures to identify cases involving conflict of interests.	3. Updated General Procedure for the Ombudsman Channel.	3. Six months after first disbursement.
1.3	Climate Change Exposure	1. Incorporate risks related to climate change into the Environmental Aspects and Impacts Matrix for Manaus and Extrema, including: i) heat waves; ii) floods; and iii) droughts.	1. Updated Environmental Aspects and Impacts Matrix for Manaus and Extrema.	1. Six months after first disbursement.
		2. Implement climate change risk mitigation and adaptation measures, as applicable.	2. Evidence of implementation.	2. Annually, as part of the ESCR.
1.4	Stakeholder Engagement	1. Develop a Mapping of Stakeholders	1. Mapping of Stakeholders	1. Six months after first disbursement.
		2. Develop a Stakeholder Engagement and Communication Plan.	2. Stakeholder Engagement and Communication Plan	2. Nine months after first disbursement.
		3. Implement the Stakeholder Engagement Plan	3. Evidence of implementation.	3. Annually, as part of the ESCR.
1.5	Grievance and Complaint Mechanism	1. Update the Opine Aqui Program to include a clause prohibiting reprisals.	1. Updated Opine Aqui Program.	1. Three months after first disbursement.
PS 2: Labor and Working Conditions				
2.1	Nondiscrimination and Equal Opportunities	1. Formalize the Hermanitos Program to include: i) goals; ii) roles and responsibilities; iii) schedule of inclusion and cultural awareness-raising activities; iv) requirement to provide critical company documents in the employees' original language, such as Internal Work Regulations, Employment Contract, Ethics Code, and Integrated EHS Management Policy; and v) monitoring and performance indicators.	1. Hermanitos Program.	1. Four months after first disbursement.
		2. Implementation of the Hermanitos Program.	2. Evidence of implementation, delivery of translated documents to employees served by the Hermanitos Program.	2. Six months after first disbursement and annually thereafter, as part of the ESCR.

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2.2	Occupational Health and Safety	1. Update the Environment and Occupational Health, Safety, and Security Management Procedure to include occupational health, safety, and security monitoring and performance indicators for employees and third parties.	1. Updated Environment and Occupational Health, Safety, and Security Management Procedure.	1. Four months after first disbursement.
2.3	Provisions for persons with disabilities	1. Develop a General Procedure for Inclusion of Persons with Disabilities (PWD) to include guidelines and procedures to: i) ensure accessibility; and ii) ensure health and safety conditions, including, as applicable, the adaptation of Personal Protection Equipment ("PPE").	1. General Procedure for Inclusion of Persons with Disabilities (PWD).	1. Six months after first disbursement.
		2. Implement a General Procedure for Inclusion of Persons with Disabilities (PWD).	2. Evidence of implementation.	2. As part of the ESCR.
2.4	Workers Engaged by Third Parties	1. Update the General Procedure for Environment and Occupational Health and Safety to include a periodic review requirement for documents confirming compliance with labor laws and salary payments.	1. Updated General Procedure for Environment and Occupational Health and Safety.	1. Six months after first disbursement.
2.5	Supply Chain	1. Update the UCB Componentes Domestic and International Procurement Policy to include minimum environmental and social requirements for critical vendors.	1. UCB Componentes Domestic and International Procurement Policy	1. Six months after first disbursement.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Resource Efficiency	1. Develop an Energy Efficiency and Water Use Program for Manaus and Extrema to include: i) energy and water consumption monitoring indicators; ii) goals; iii) awareness-raising activities; iv) resource-use efficiency projects; v) schedule and action plan; vi) roles and responsibilities.	1. Energy Efficiency and Water Use Program	1. Six months after first disbursement.
		2. Implement the Energy Efficiency and Water Use Program.	2. Evidence of Implementation of the Energy Efficiency and Water Use Program	2. Annually, as part of the ESCR.
3.2	Waste	1. Update the Waste Management Program at Extrema and Manaus to include: i) monitoring and performance indicators; and ii) specific requirements for hazardous waste handling, including: a) labeling and identification; b) local infrastructure features (floor, ceiling, temperature, etc.); c) access restriction and control; and d) health, safety, and security procedures.	1. Updated Waste Management Programs	1. Four months after first disbursement.
		2. Develop a Reverse Logistics Program to establish recovery and recycling or destination procedures for batteries, as applicable, including goals and monitoring indicators.	2. Reverse Logistics Program.	2. Six months after first disbursement.
		3. Implement Reverse Logistics Program.	3. Evidence of implementation.	3. Annually, as part of the ESCR.
PS 4: Community Health and Safety				
4.1	Security Personnel	1. Develop a Security Personnel Management Procedure that establishes document and training requirements, including human rights training.	1. Security Personnel Management Procedure.	1. Six months after first disbursement.
		2. Implement the Security Personnel Management Procedure.	2. Evidence of implementation.	2. Annually, as part of the ESCR.