

**DERRIMON TRADING – JAMAICA**  
**Environmental and Social Action Plan (o ESAP)**

No.	Aspect	Action	Deliverable	Delivery date
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>				
1.1	Environmental and Social Management System (ESMS)	1. Prepare a compliance requirement matrix, including all applicable Environmental, Social, Health & Safety (ESHS) requirements from the Permits or laws and their current implementation status.	1. Updated compliance requirement matrix	1. Six months after 1 <sup>st</sup> disbursement
		2. Develop an integrated ESHS policy	2. ESHS policy	2. Six months after 1 <sup>st</sup> disbursement
		3. Develop a Procedure to identify and assess environmental and social (E&S) risks and impacts	3. Identification of E&S risks and impacts procedure.	3. Six months after 1 <sup>st</sup> disbursement
		4. Prepare a matrix identifying potential environmental and social risks and impacts as well as associated mitigation measures. The matrix will also include those impacts and risks related to climate change.	4. Risk and Impacts Identification Matrix	4. Six months after 1 <sup>st</sup> disbursement
		5. Develop management plans and procedures to: i) prevent, mitigate or compensate any ESHS risk and impact (as identified in the matrix); and ii) fulfill any requirement contained in the environmental permits.	5. ESHS Risk and Impact Management Plans and Procedures.	5. Nine months after 1 <sup>st</sup> disbursement
		6. Prepare an organigram of ESHS staff	6. ESHS Organigram	6. Three months after 1 <sup>st</sup> disbursement
		7. Prepare training schedules on ESHS management and emergency preparedness.	7. Training schedule	7. Nine months after 1 <sup>st</sup> disbursement
		8. Develop an Emergency Preparedness and Response Plan (EPRP) considering the results of the E&S risk and impact identification matrix.	8. Emergency Preparedness and Response Plan	8. Nine months after 1 <sup>st</sup> disbursement
		9. Develop a stakeholder engagement plan including: i) a stakeholder identification; ii) an external grievance mechanism; and iii) communication procedure to inform stakeholders on Project activities.	9. Stakeholder Engagement Plan	9. Nine months after 1 <sup>st</sup> disbursement
		10. Develop a procedure and schedule to monitor and audit effectiveness of the ESMS.	10. Monitoring and Audit Procedure and schedule	10. Nine months after 1 <sup>st</sup> disbursement
		11. Develop an ESMS Manual	11. ESMS Manual	11. Nine months after 1 <sup>st</sup> disbursement
		12. Provide evidence of implementation of the ESMS components detailed above	12. Evidence of implementation of the ESMS components detailed above	12. As part of the E&S Compliance report (ESCR)
<b>PS 2: Labor and Working Conditions</b>				
2.1	Human Resources Policies and Procedures	1. Update the scope of the Employee Handbook to incorporate all business divisions	1. Updated Employee Handbook	1. Six months after 1 <sup>st</sup> disbursement
2.2	Grievance Mechanism	1. Enhance the internal grievance procedure to (i) allow for anonymous complaints to be raised and addressed and (ii) expand its scope to include contractors.	1. Updated Internal Grievance Procedure	1. Six months after 1 <sup>st</sup> disbursement

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2.3	Occupational Health and Safety	1. Develop a comprehensive H&S Plan for all company operations, including i) a risk assessment of all potentially hazardous activities, based on a hazard identification matrix, classifying hazards according to accident and incident risk, severity, and probability; ii) specific control measures and management procedures, iii) provisions for hazardous material handling and management, iv) H&S training program for workers and v) record keeping templates and procedures	1. Health and Safety Plan	1. Nine months after 1 <sup>st</sup> disbursement
2.4	Workers Engaged by Third Parties	1. Prepare contractual provisions on antidiscrimination, prevention of child and forced labor, health and safety and environmental requirements for contractors.	1. Copy contractual provisions for third parties (contractors).	1. Six months after 1 <sup>st</sup> disbursement.
		2. Include contractual provisions (as above) in contracts of contractors.	2. Copies of the pertinent sections of the executed contracts with contractors	2. As part of the ESCR
2.5	Supply Chain	1. Develop a Supplier Policy (SP) that requires primary. <sup>1</sup> suppliers to comply with i) the applicable labor, Health & Safety, and Environmental requirements of each country where production and manufacturing takes place and ii) International Labor Organization (ILO) conventions related to Forced and Child Labor.	1. Supplier Policy	1. Six months after 1 <sup>st</sup> disbursement.
		2. Implement the Supplier Policy	2. Evidence of implementation	2. As part of the ESCR
<b>PS 3: Resource Efficiency and Pollution Prevention</b>				
3.1	Resource Efficiency	1. Define targets and continue measurements of environmental indicators (such as energy, fuel, and water consumption), and if necessary, develop efficiency measures.	1. Registers and analysis of energy, fuel, and water consumption	1. As part of the ESCR
3.2	Waste Management	2. Develop a Waste Management Plan (WMP), including responsibilities, internal collection points, segregation protocols, ways to record the amount and type of waste generated, monitoring procedures and feasible options to reduce, reuse or recycle the waste.	2. Waste Management Plan	2. Nine months after 1 <sup>st</sup> disbursement
		3. Implement the WMP	3. Evidence of Implementation	3. As part of the ESCR
3.3	Hazardous Materials Management	1. Phase-out Plan for R22 (refrigerant), in accordance with the Montreal Protocol	1. Phase-out Plan for R22	1. Six months after 1 <sup>st</sup> disbursement.
		2. Implement the Phase-out Plan for R22	2. Evidence of Implementation	2. As part of the ESCR
<b>PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>				
6.1	Supply Chain	1. Develop a Supplier Selection and Evaluation Procedure (SSEP) to identify E&S risks linked to the primary supply chain, especially in regions where there is a risk of significant conversion of natural or critical habitats.	1. Supplier Selection and Evaluation Procedure	1. Nine months after 1 <sup>st</sup> disbursement
		2. Implement the SSEP	2. Evidence of implementation	2. As part of the ESCR

<sup>1</sup> Primary suppliers are those suppliers who, on an ongoing basis, provide the majority of living natural resources, goods, and materials essential for the core business processes of the Company.