

#	Task Title	Task Description	Completion Indicator	Milestone Due Date
1.	ESIA Update	Completion of the required updates and refinement of the ESIA including: (i) updates to the hydrodynamic model for the proposed phosphogypsum site to assess potential impacts and inform the design of the liner and leachate collection systems, (ii) a site-specific flash flood assessment and modeling, and (iii) completion of a traffic impact assessment, (iv) All required EHS permits and authorizations obtained.	<ul style="list-style-type: none"> (i) Updated hydrodynamic model for the phosphogypsum storage site (ii) Site specific flash flood risk assessment (iii) Traffic baseline and impact assessment (iv) All required EHS permits and authorizations obtained. 	(i), (ii), (iii) 30 November 2026 (iv) 30 November 2026
2.	Quantitative Risk Assessment	Complete a Quantitative Risk Assessment (QRA) identifying potential risks associated with the transport of liquid ammonia. This will include potential transport modalities, namely, road tankers and a 13km pipeline from the Sonker storage terminal. Further, given the nature of the project, the QRA will also cover the cumulative risks posed by the operation as a whole, including identification and exclusion of offices, workshops and other similar locations within intolerable zones	Completed QRA to the satisfaction of the lenders	28 February 2026

3.	Import and Export Infrastructure Risk Assessment	Complete the necessary environmental risk assessment, Hazard Identification (HAZID), Hazard and Operability (HAZOP) and QRA for the two 15,000 metric tonnes (MT) Phosphoric acid storage tanks and the port unloading arm (as relevant) prior to their construction and operation.	Completed environmental risk assessment, HAZID, HAZOP and QRA to the satisfaction of the lenders	30 November 2026
4.	HAZOP Study	Complete a Hazard and Operability (HAZOP) study and a Layer of Protection Assessment (LOPA) to further inform the Project design. Similar process safety assessments will be done upon completion of the construction phase and prior to plant commissioning	(i) Pre-construction HAZOP and LOPA study (ii) Pre-commissioning HAZOP and LOPA study	(i) 30 June 2027 (ii) 30 November 2029
5.	E&S Management System and Plans	Develop and maintain an integrated Environmental and Social management system for the entire facility covering both construction and operational activities. Continuously Review systems and procedures to ensure they remain valid and identify opportunities for improvement. Develop and implement the required plans to manage , mitigate and monitor project impacts during construction and operations, including: (i) Transportation	ESMS developed and maintained Respective management plans developed and approved to the satisfaction of the lenders	(i), (vi) 30 November 2026 (ii), (iii), (iv), (v), (vii), (viii), (ix), (x). 30 November 2029

		Management Plan, (ii) Noise Management Plan, (iii) Air Quality/Emissions Management Plan, (iv) Waste Management Plan (solid and hazardous), (v) Wastewater Management Plan, (vi) Emergency Preparedness and Response Plan (EPRP), (vii) Resource and Energy Efficiency Management and Monitoring Plan (viii) Pollution Prevention and Spill response Plan, and (ix) Security Management Plan and (x) Alien Species Management Plan.		
6.	Construction ESMP	The Engineering, Procurement and Construction (EPC) contractors will be required to develop a Construction Environmental and Social Management Plan (CESMP) and other relevant management plans prior to the commencement of construction activities	Completed CESMP to the satisfaction of the lenders	31 December 2025
7.	Organizational Capacity	Commensurate to the nature of the anticipated project risks and impacts, establish, maintain, and strengthen an organizational structure that defines roles, responsibilities, and authority to monitor and ensure implementation of the ESAP and ESMS or Integrated Management System throughout the construction and operational phases. This will include employment, prior to the commencement of construction activities, suitably qualified and	Organizational structure established and maintained. Proof of employment for each position provided to the lenders.	30 November 2026)

		experienced EHS resources. At a minimum, this will include an Environmental Manager, Health and Safety Manager, and Human Resources (HR) manager.		
8.	Monitoring and Review	<p>Indorama will develop and adopt an appropriate E&S monitoring framework for both the operational and construction phases of the project. At a minimum, this will include (i) continuous monitoring of point source air emissions (including connection to the EEAA's continuous monitoring network), (ii) ambient air quality, (iii) workplace emissions monitoring to determine worker exposure to hazardous materials and gases, (iv) workplace noise emissions, (v) heat stress monitoring, (vi) monitoring of waste production and disposal, (vii) water quality.</p> <p>Further, Indorama will also be required to develop an Environmental and Hazardous Waste Register, including permitting requirements, to track the environmental aspects of construction and operational activities.</p>	<p>(i) E&S Monitoring Framework</p> <p>(ii) Environmental and Hazardous Waste Register</p>	<p>(i) 30 November 2026</p> <p>(ii) 30 November 2026</p>
9.	Human Resource Management	Develop and implement an integrated HR management system, including development of relevant policies and procedures, including, but not limited to, a Code	Development and implementation of all relevant HR policies and procedures, as per the requirements of	31 May 2026

		of Conduct, Employee Handbook, Grievance Mechanism, Anti-Harassment Policy, GBVH prevention and response, Contractor management Plan, Supply Chain Code of Conduct, Worker Accommodation Manual (incl. temporary construction accommodation) etc. All policies and procedures will be aligned with Egyptian labor law, IFC Performance Standard 2 and EBRD Performance Requirement 2.	Egyptian Labor Law and IFC PS2 & PR2	
10.	OHS Management System	Develop an OHS Management Plan, and related standard operating procedures (SOP) to identify and manage potential operational OHS risks. This plan will include specific protocols and requirements and account for any hazardous activities carried out during commissioning, an awareness and training program, an accident and investigation process, an emergency preparedness program, and adherence to general site rules. The company will further ensure that an inspection and auditing program is in place as part of its contractor management plan.	OHS Management Plan and associated SOPs developed to the lender's satisfaction	30 November 2026
11.	Supply Chain Management System (SCMS)	Develop and implement a SCMS including as a minimum: (i) a procurement policy and supplier code of conduct that addresses labor and working conditions in	SCMS developed to the lender's satisfaction	31 May 2026

		accordance to the national law and significant workplace and community safety issues as per IFC PSs and EBRD PRs; (ii) inclusion of contractual clauses requiring suppliers' compliance with the code of conduct; (iii) a verification process to ensure new suppliers have the policies and procedures in place to meet requirements of the code of conduct; (iv) a communication strategy to inform suppliers about the code of conduct; and (v) a formal process for supplier engagement, remedy or disengagement in case of non-compliances that are not addressed.		
12.	Waste Management	For the phosphogypsum storage site, Indorama will (i) investigate measures to reduce the phosphogypsum generation rate (e.g. through process optimization) to achieve the industry benchmarks (ii) carry out regular monitoring of the Phosphogypsum for any hazardous and radioactive properties and thereafter take actions as needed to manage and dispose the phosphogypsum as hazardous waste. If such determination is made through the monitoring (iii) design and construct an appropriate lining and leachate collection system in line with good industry practices (based	(i) Process optimization study to reduce phosphogypsum generation rate (ii) Phosphogypsum monitoring protocol developed If phosphogypsum is determined to be hazardous: (iii) Design of lining and leachate collection system	30 November 2029

		on hydrodynamic modelling - ref. ESAP #1), (iv) develop a Radon Monitoring and Management Plan, and (v) develop and implement a groundwater and soil monitoring protocol to detect any potential contamination.	(iv) Radon Monitoring and Management Plan (v) Groundwater and Soil monitoring protocol	
13.	Stakeholder Engagement	<p>Adopt a Stakeholder Engagement Plan (SEP), aligned with the requirements of PS1 and PR10, identifying relevant project stakeholders and defining engagement modalities and timing commensurate to the nature of project risks and impacts.</p> <p>Further, the company will disclose a non-technical summary of the ESIA and conduct a public consultation process to present the findings and recommendations emanating from the ESIA, and where relevant, stakeholder comments and concerns will be incorporated into the final document prior to submission to the competent authority for approval.</p> <p>Implement an external grievance management mechanism aligned with the requirements of PS1 and PR 10.</p>	(i) SEP developed to the satisfaction of the lenders (ii) Non-Technical Summary disclosed and completion of public consultation (iii) External community grievance mechanism	30 November 2026
14.	Pollution Prevention and	Design and operate the Project in line with EU Best Available	Plants designed, operated, and	Monitored annually

	Control - Air emissions	Techniques (BAT) for the fertilizer sector and the associated BAT-BREF limits, including the Total Suspended Particulates (TSP) emission concentrations for phosphoric acid and DAP production and SO2 emissions from the sulphuric acid plant. Continuous monitoring of actual performance shall be undertaken to ensure compliance with EU and BAT-BREF limits. Where such monitoring confirms exceedances of the standards, Indorama shall implement additional abatement measures to achieve compliance.	monitored in compliance with EU and BAT-BREF limits, with additional abatement measures implemented where necessary.	
15.	Operational phase compliance	Maintain operations in alignment with IFC PSs' and EBRD PRs' requirements	Annual report submitted	Annually