

Environmental and Labor Issues: This is a category B project according to the IIC's Environmental and Social Sustainability Policy because it could produce certain effects that may be avoided or mitigated by following generally recognized performance standards, guidelines, or design criteria. The main environmental and labor considerations to the project are solid and hazardous materials management, liquid effluent treatment, labor, occupational health and safety, and community health, safety, and security. Environmental and Labor Standards: The IIC's environmental and social review included an assessment of the facilities at JAJ's operations in Pernier and Léogâne, in order to ensure compliance with IIC policies and standards applicable to this project. The environmental and social standards that are applicable to this investment include: the IIC Environmental and Social Sustainability Policy, applicable elements of the Inter-American Development Bank (IDB) Environmental and Safeguards Compliance Policy, the International Finance Corporation (IFC) Performance Standards (i.e., PS2 and PS4), the IFC Environmental, Health, and Safety (EHS) General Guidelines, and the IFC EHS Guidelines for Mining. Other standards may become applicable in the future should further information suggest such a change. Environmental and Social Management System: JAJ does not have a formal written Environmental and Social Management System (an ESMS). JAJ will develop an ESMS that includes an overarching Environmental and Social Policy, and a set of written environmental and social management plans (ESMP) to address environmental, social, labor, and health and safety issues associated with the project. Solid Wastes: The project currently burns office and employee trash on-site at both Pernier and Léogâne. JAJ will develop a Waste Management Plan to separate recyclables and dispose of other solid wastes in a dedicated site at both Pernier and Léogâne. Wastewater: The project is currently discharging water used to wash aggregate material directly back to the nearby rivers at both Pernier and Léogâne. This water has high sediment load. The project should construct settling ponds at both Pernier and Léogâne to reduce the sediment discharged back to the rivers. Hazardous Materials Management: JAJ will change and improve its current practice to handle used oil at both Pernier and Léogâne. JAJ will begin to store used oil and find a contractor to recycle it. Current fuel and oil storage tanks at Pernier do not have secondary containment. JAJ will construct all new fuel and oil tanks at both Pernier and Léogâne with secondary containment that complies with IFC EHS General Guidelines. Stakeholder Engagement: JAJ conducted three public consultations per community in Pernier and Léogâne, prior to establishing each site, in accordance with the Bureau of Mines and Energy requirements for consultation, and the consultation process lasted approximately two months at each site. JAJ will appoint an employee to be the community engagement representative for the Company, and will engage on an ongoing basis with the communities of Pernier and Léogâne throughout the expansion construction phase. Labor: Currently there is no written Human Resources (HR) Policy at JAJ. JAJ will develop a written HR Policy that addresses equal treatment and opportunity without discrimination; gender equality; child/forced labor; retrenchment; workers' freedom to organize; and treatment of temporary workers. Occupational Health and Safety: JAJ does not have a formal Occupational Health and Safety (OHS) Management Plan; however, it does have an informal Workers' Code of Conduct (WCOC). JAJ should develop an OHS Management Plan (including their WCOC) that complies with the requirements of PS 2 and the relevant IFC EHS Guidelines (and includes procedures for working at heights above the screening/crushing machinery). Community Health, Safety, and Security: Currently there are no written plans or procedures relating to traffic and pedestrian management near the Pernier and Léogâne facilities. No information is available related to local communities' exposure to disease, and no plans or procedures are available related to the use of security personnel at the Pernier and Léogâne facilities. JAJ will develop and implement a Traffic Management Plan for communities along the roads from Port-au-Prince to Pernier and Léogâne and safety measures will be taken to protect the small businesses and people living along the roads from the trucks on its operations. JAJ will install signs close to the Grise River bed warning about the Pernier mine operation and the dangers of engaging in bathing, laundry, and other activities in the river during the hours when the mine is in operation. JAJ will conduct a health baseline assessment and it will describe existing health ailments,

respiratory diseases in particular, in its operations in Pernier and Léogâne. JAJ will conduct an assessment of potential security risks associated with each of the two Project facilities, and will prepare a security management plan. JAJ will develop its own Security Policy which will be based on the Voluntary Principles on Security and Human Rights and its implementation guide.

**Decommissioning:** Prior to relocate operations at the Pernier location, JAJ will prepare a simple Decommissioning Plan for the existing Pernier site to address any Project-related scrap machinery/metal, storage tanks, soil contamination, etc. **Fire Prevention and Emergency Response:**

Currently there are no written plans or procedures related to Emergency Preparedness and Response for its operations. JAJ maintains its certificate of coverage from the Haitian National Fire Brigade. JAJ will continue to maintain that certificate. JAJ will also create a Contingency and Emergency Preparedness and Response Plan to meet IIC's requirements, and it will describe a Project-specific plan and be applicable to Project workers, employees of contractors and subcontractors, along with the local communities. **Monitoring and Reporting:** During the project with the IIC, JAJ will implement the prevention, control, and mitigation measures related to the issues outlined in this summary and included in the Environmental and Social Action Plan (ESAP) that will be agree with the IIC, to ensure compliance with the requirements of the IIC. An annual environmental and social monitoring report will be submitted to the IIC on the implementation and status of the ESAP that includes information on solid and hazardous materials management, liquid effluent treatment, labor, occupational health and safety, and community health, safety, and security.