

PUBLIC DISCLOSURE NOTICE — DRAFT VERSION (11 OCTOBER 2026)

This draft enhanced ESGMS is published for public information and consultation in connection with BW's proposed investment by AIIB. It remains subject to further review, revision and formal approval. Publication does not mean that all proposed policies, procedures or measures have been formally adopted or fully implemented. Additional enhancements will be implemented in accordance with the applicable Environmental and Social Action Plan (**ESAP**), where relevant. BW will publish the final version upon completion of the review and approval process.

**DRAFT ENVIRONMENTAL, SOCIAL AND GOVERNANCE
MANAGEMENT SYSTEM****BW INDUSTRIAL DEVELOPMENT JOINT STOCK COMPANY**

October 2026

Document control

Version history

Version	Date	Description
1.0 Draft	October 2026	First issuance of the consolidated ESGMS. Incorporates the ESG Policy; adds risk identification, management programs, organizational capacity, emergency preparedness, stakeholder engagement, grievance mechanism, reporting to affected communities, and monitoring and management review.

Approval

Role	Name	Date
Prepared by	Legal & Corporate Governance	
Reviewed by	General Counsel – Legal & Corporate Governance	
Approved by	Chief Executive Officer	
Approved by	Board of Directors	

Abbreviations

AIIB	Asian Infrastructure Investment Bank
BW	BW Industrial Development Joint Stock Company
BW's Guidelines	KYC BW's internal Know Your Customer guidelines and procedures, as amended from time to time
EHS	Environment, health and safety
EIA	Environmental impact assessment under the Law on Environmental Protection
EPRP	Emergency preparedness and response plan
E&S	Environmental and social

ESAP	BW Environmental and Social Action Plan
ESDD / EDD	Environmental and social due diligence / environmental due diligence
ESEL	Environmental and Social Exclusion List
ESGMS	This Environmental, Social and Governance Management System, as amended from time to time
ESS	Environmental and Social Standard
FM	Facilities Management
IFC	International Finance Corporation
GBV	Gender-based violence
GHG	Greenhouse gas
GRM	Grievance redress mechanism
KYC	Know-your-customer
OHSE	Occupational health, safety and environment
PPM	Project-affected People's Mechanism
PV	Photovoltaic
RBF / RBW	Ready-built factory / ready-built warehouse
SEA/SH	Sexual exploitation, abuse and sexual harassment
SEF	Stakeholder Engagement Framework
WWTP	Wastewater treatment plant

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1. Background

BW is a leading industrial and logistics real estate platform in Vietnam, developing and operating modern industrial and logistics facilities across key economic and manufacturing hubs in the country.

BW has prepared this ESGMS as a group-wide framework to support consistent management of E&S matters across BW Operations and to address relevant requirements of its investors, lenders and shareholders. In connection with particular investments or financings, BW may agree investor- or lender-specific E&S requirements, action plans or reporting arrangements. Such requirements are implemented through this ESGMS and its supporting procedures to the extent applicable.

This ESGMS has been prepared to consolidate BW's existing policies, procedures and practices into a single framework and to address the matters identified in ESAP. Requirements specific to an individual investor or lender are recorded in Annex B and apply only to the extent agreed under the relevant investment or financing arrangements.

2. Introduction of BW's ESGMS

2.1 Scope and application

This ESGMS applies to BW Operations. For the purposes of this document, "**BW Operations**" means the operations of BW and its controlled subsidiaries, limited to activities and assets within their operational control. Requirements relating to tenants, contractors, suppliers or other third parties apply only to the extent BW, or its controlled subsidiaries can reasonably impose or enforce such requirements under applicable law and the relevant contracts.

Within that scope the ESGMS covers the full asset lifecycle:

Lifecycle stage	What the ESGMS governs
Investment and land / asset acquisition	E&S screening and risk categorization; exclusion list screening; environmental due diligence; review of past land acquisition; international waterways screening; climate and natural hazard screening
Construction	Design standards for fire safety, structural safety, loading and circulation, ventilation and daylight; material specification; resource efficiency and rooftop solar readiness Contractor prequalification and contractual EHS requirements; the OHSE Site Management Plan; permits to work and high-risk activity controls; worker labor standards; emergency preparedness and response; community health and safety; waste and wastewater controls; construction supervision and reporting
Operation and Leasing	Facilities management and the facility manager's EHS scope; tenant EHS monitoring; common-area and shared-infrastructure management including wastewater, waste and pest control; fire drills and emergency arrangements; environmental protection reporting; grievance handling; monitoring and annual reporting Tenant due diligence; the Tenant Code of Conduct; EHS obligations in the lease

2.2 Applicable requirements and hierarchy

BW manages environmental, social and governance matters against two levels of requirements:

- **Vietnamese law.** This is the binding floor. Compliance with applicable Vietnamese law, and with the conditions of BW's permits, approvals and environmental impact assessment decisions, is a minimum requirement.
- **International standards.** This ESGMS seeks to be materially consistent with the objectives of applicable international E&S standards, proportionate to the nature, scale and material risks of BW Operations. BW refers to recognized international E&S standards, including the IFC Performance Standards on Environmental and Social Sustainability (2012), the AIIB Environmental and Social Framework (2024) where applicable, and other standards or requirements agreed with relevant investors or lenders.

2.3 Organizational Capacity and Competency

Management structure

Tier	Body / role	Principal ESGMS responsibilities
Corporate - first tier	The Board of Directors and Senior Management, led by the CEO	• Approve the ESGMS and material amendments in accordance with BW's internal approval authority
Corporate - second tier	Sustainability Team, operating under the oversight of the CEO and coordinated by a designated ESG Lead, with representatives from relevant functional teams	• Coordinate day-to-day implementation of the ESGMS through the designated ESG Lead, who also serves as the point of contact for investors and lenders on E&S matters.
Function and site - third tier	Designated ESG focal points in relevant functional departments and at applicable sites	• Implement applicable ESGMS requirements in day-to-day operations

Detailed ESGMS responsibilities for each functional department

Investment	• E&S management of every new investment; • Past land acquisition and legacy land issues; • E&S findings and mitigation measures in the investment memo
Legal & Corporate Governance	• Standard contract templates and their E&S provisions; • Regulatory compliance advice; • Tenant and counterparty due diligence, sanctions screening;

	• The Whistleblower Policy; compliance and ESG training
Projects & Construction (including HSE)	• E&S performance during design and construction • Environmental licensing and approvals required before construction • The OHSE Site Management Plan and contractor EHS management • Emergency preparedness and response for construction activities • Site inspection, incident investigation and construction HSE training
Facilities Management	• Operational E&S performance of operating assets and common areas • Monitoring and periodic environmental protection reporting • Wastewater, waste and hazardous waste arrangements • Fire safety, drills and pest control • Tenant EHS monitoring and fitting-out approval • Site security; first response to concerns raised at site level
Leasing & Customer Service and Key Account	• Tenant information required for due diligence and screening • Communication of the Tenant Code of Conduct and BW's EHS requirements • Escalation of tenant EHS issues
Information Technology	• Supports data security and personal data protection in the handling of ESGMS records
Human Resources & Admin	• Labor and working conditions for BW's own workforce • Training delivery and records • Employee grievances • Office health and safety
Communications	• External E&S disclosure and the ESG pages of BW's website • The annual ESG Report • External enquiries on E&S matters

Capital Market	- Budget for E&S resourcing, monitoring, training and external consultants - Disclosure of related party transactions
Finance & Accounting	

2.4 Supporting Procedures and Instruments

The ESGMS operates through the policies, procedures, standards and contractual instruments listed below. Each instrument is controlled by its own owner and may be updated without amending this ESGMS, provided the update remains consistent with it.

BW incorporates relevant labor and working-condition requirements into its Supplier Code of Conduct, which shall be incorporated into new contracts with material contractors and suppliers directly engaged by BW, and into renewals or material amendments to existing contracts where reasonably practicable.

Sector	Relevant policies, procedures and guidelines
Business conduct and governance	- Code of Ethics - FCPA and Anti-Bribery Compliance Policy - Whistleblower Policy - General IT Policy - Conflict of Interest Handling Guidelines - Supplier Code of Conduct
Risk identification	- Environmental Due Diligence (Phase I ESA) - Know-Your-Customer (KYC) Guidelines - Contractor Prequalification Questionnaire
Construction	- OHSE Site Management Plan - Emergency Preparedness and Response Plan - Fire Prevention and Fighting Plan - First Aid Plan - Traffic Management Plan
Operations	- Tenant Code of Conduct - Tenant monitoring checklist

	• Emergency Response Plan • Security procedure • FM Procurement
People	• Internal Labor Regulations • Collective Labor Agreement • Employee Handbook • Onboarding, orientation and compliance training
Engagement, grievance and reporting	• Grievance register and procedure • Website disclosure package • ESG Report

2.5 Training

BW provides ESG training proportionate to the responsibilities of each role. Annual ESG awareness training is provided to all employees to promote a general understanding of the ESGMS and the channels available to raise concerns. Role-specific training is provided to those with E&S responsibilities to enable them to perform their duties competently. Workers of contractors engaged on BW-controlled sites receive site induction covering the Worker Code of Conduct, applicable safe working requirements and available grievance channels, proportionate to the nature of their work.

2.6 Review and update of the ESGMS

The ESGMS is reviewed at least once a year, and whenever a change in applicable Vietnamese law or in BW's business would significantly affect the ESGMS. Once approved, the version history is updated, and the published version is replaced.

Any proposed material amendments affecting investor-specific commitments are reviewed for consistency with the applicable investment or financing arrangements and are subject to any consent or approval requirements under those arrangements.

3. Components of BW's ESGMS

3.1 Environmental, Social and Governance Principles and Commitments

The objectives of the ESGMS are to:

- safeguard the environment and use natural resources efficiently across the asset lifecycle;
- protect the health, safety and rights of the people who build, work in and live around BW's facilities, and respect the communities in which BW operates; and

- maintain stringent and impartial corporate governance in daily operations, including in environmental, health, safety and social matters.

In giving effect to these objectives, BW commits to:

- comply with applicable law and with the conditions of its environmental permits, approvals and EIA decisions, at every site and at every stage of the asset lifecycle;
- assess environmental and social risks before it commits to an investment;
- measure and monitor, subject to the availability of reliable data, and work to reduce the greenhouse gas emissions, energy, water and waste intensity of the properties under its management and of its own corporate operations, and build resilience to natural hazards and climate risks into the design and management of its assets;
- strive for zero workforce fatalities and work to prevent serious injuries at BW-managed sites, and require contractors, through their contracts, to comply with BW's OHSE requirements;
- prohibit forced labor and harmful or exploitative child labor in its own operations, and require material contractors and suppliers directly engaged by BW to do the same, proportionate to the nature and risks of the engagement; and provide fair and lawful employment conditions, equal opportunity and a workplace free from discrimination and harassment within BW's own workforce;
- manage the health and safety risks to communities directly affected by its development, construction and operational activities, so far as those risks are within BW's reasonable control;
- maintain accessible channels through which workers, tenants, communities and other stakeholders can raise concerns, and respond to what is raised without retaliation against the person raising it; and
- measure, monitor and publicly disclose its ESG performance annually.

3.2 Risk Identification

BW identifies and assesses material E&S risks and impacts arising from its existing operations through E&S risk registers for operating assets; hazard identification and risk assessments for construction activities under the OHSE Site Management Plan; tenant EHS monitoring within the scope of BW Operations; and high-level screening of physical climate risks across its portfolio. New investments are screened as set out below.

(i) Preliminary E&S screening and categorization of new investments

a) Preliminary E&S screening

Every new investment undertaken by BW is screened before it is approved. Screening comprises a KYC check and a public negative-media and E&S screening. The proposed investment is screened against the following criteria:

- whether the investment, or the activity to be carried out, involves any activity on the BW Exclusion List;
- the location of the site - whether it lies within an established industrial park holding park-level environmental approvals, and its proximity to any area legally protected for biodiversity or cultural heritage;

- the land acquisition history of the site, whether physical or economic displacement has occurred or would be required;
- whether the investment may reasonably be expected to affect an International Waterway in a transboundary context;
- whether the investment may affect Indigenous Peoples or ethnic minority communities; and
- exposure to flood, storm, subsidence, saline intrusion, extreme heat and other natural hazards, and projected climate risk.

Where screening identifies potential impacts on Indigenous Peoples or ethnic minority communities, BW shall conduct a proportionate site-specific social assessment and culturally appropriate consultation, including free, prior and informed consultation or consent where required by applicable investor or lender standards. BW shall notify the relevant investor or lender where required and implements appropriate measures within its reasonable control. All screening results, including negative findings, are recorded.

b) Categorization of new investments

Following screening, each proposed investment is assigned a High, Medium or Low E&S risk rating, taking into account its location, scale, activities and potential E&S impacts. The risk rating and corresponding mitigation measures are presented to the Investment Committee in the investment memorandum for consideration and approval. BW's internal risk ratings are distinct from investor or lender E&S categorizations, which are addressed separately in Annex B where applicable.

High E&S Risk	A standalone site outside an established industrial park; a site adjoining an area legally protected for biodiversity or cultural heritage; potential physical or economic displacement; potential impacts on Indigenous Peoples or ethnic minority communities; or known significant contamination. Required actions: Enhanced E&S due diligence, appropriate mitigation conditions in the investment approval, and notification of relevant investors or lenders where required.
Medium E&S Risk	An investment within an established industrial park where screening or due diligence identifies E&S findings requiring specific mitigation beyond BW's standard controls, such as outstanding environmental non-compliance at an asset being acquired. Required actions: Targeted E&S due diligence and appropriate mitigation measures as conditions of investment approval.
Low E&S Risk	BW's typical investment involving the development of ready-built facilities within an established industrial park holding park-level environmental approvals, with no material E&S findings and impacts manageable through BW's standard controls. This also includes investments without land acquisition or construction activities, provided no material E&S risks are identified. Required actions: Application of BW's standard design, construction and operating controls.

(ii) Due diligence on past land acquisition

Where land has been recovered by the State and allocated or leased to an industrial park developer, the industrial park developer and the competent authority are responsible for that process, and BW takes a sublease or secondary lease of land within the park. BW is not the acquiring authority and has no power to reopen a completed statutory land acquisition. This section applies where land has been acquired by the Government and subsequently handed over directly to BW for asset development.

Where required under an applicable investor or lender arrangement, BW may extend the review to land within established industrial parks, in accordance with the specific requirements set out in Annex B.

a) Review scope

- establishes the land acquisition history - the recovery decision, the compensation and resettlement plan, the approved compensation rates, the timing, and the authority responsible;
- identifies whether physical or economic displacement occurred, how many households or users were affected, and what compensation and assistance were provided;
- identifies whether compensation and assistance were completed, whether any claims, complaints, petitions or litigation remain outstanding, and whether any part of the site remains occupied or in use;
- identifies any affected person who appears not to have been compensated or assisted, including users without formal title where the law provides for assistance; and
- identifies whether vulnerable groups were among those affected and whether they received the assistance the law provides for.

b) Information standard

The review is based on information reasonably available to BW - land records and the land certificate or lease; the compensation and site clearance file held by the competent authority; site reconnaissance; and interviews with the authority, the transferor and, where appropriate, occupiers or former occupiers.

BW requests the records it needs and records what it requested, what it received and what was not available. The review does not require BW to reopen a completed land acquisition process, to conduct a census or valuation of its own, or to substitute itself for the competent authority, in the absence of an identified material issue.

c) Material legacy issue trigger

A material legacy E&S issue is identified where the review discloses any of the following:

- compensation or assistance that was due under the applicable decision appears not to have been paid or provided in full;
- an active grievance, petition, complaint or dispute, or pending litigation, relating to the acquisition of the site;
- physical or economic displacement in respect of which the record of compensation or assistance is absent, incomplete or inconsistent;

- continuing occupation or use of any part of the site by a person who has not been compensated or assisted; or
- an indication that the livelihoods of affected persons were materially impaired and not restored.

d) Escalation

Where a material legacy issue is identified, BW:

- conducts an enhanced review of the issue, proportionate to its nature and scale, including where warranted a social assessment of the affected persons;
- records the issue in the E&S risk register and reports it to the Senior Management and Board of Directors; and
- where appropriate, discusses with the relevant investor or lender, where applicable, the measures appropriate to address the issue, taking into account the circumstances and matters within BW's reasonable control.

(iii) International Waterways

The preliminary screening under section 3.2 establishes whether a new investment may reasonably be expected to affect an International Waterway in a transboundary context. The screening result is recorded for every investment, including a negative result.

Where the screening identifies a potential significant impact on the quantity, quality, flow of, or access to, the water of an International Waterway, BW informs the relevant investor or lender, where applicable, for further assessment.

For the purposes of this ESGMS, an International Waterway means: (i) a body of surface water that: (A) forms a boundary between, or flows through, two or more countries; (B) is recognized as a necessary channel of communication between the open sea and two or more countries; (C) is a tributary or component of any body of water described above in (A) or (B); or (D) is a bay, gulf, strait, or channel and that is bounded by two or more countries; or (ii) a body of trans-boundary groundwater. The body of water may be a river, lake, canal, bay, gulf, strait, sea, aquifer or similar body of water.

(iv) Prohibited Practices and Debarment Screening

BW incorporates into its ESGMS a proportionate onboarding/KYC screening procedure for designated direct counterparties, including tenants, investors (such as joint venture partners) and industrial park developers from whom BW leases land, and such relevant owners or controllers as may be required under BW's KYC Guidelines or agreed with relevant investors or lenders. Screening is conducted against applicable sanctions and debarment lists identified in BW's KYC Guidelines or the relevant investment or financing arrangements.

Periodic rescreening is not required unless required under the applicable arrangement or BW becomes aware of information giving rise to a relevant concern. Any one-off screening of existing counterparties, treatment of subsequent list updates and related remedial actions are implemented in accordance with applicable law, existing contractual obligations and matters within BW's reasonable knowledge and control.

Where BW becomes aware of, or reasonably suspects, involvement of a relevant counterparty in a Prohibited Practice, BW investigates the concern proportionately and informs the relevant investor or lender where required under the applicable arrangement and to the extent permitted by law..

(v) Contractual E&S Risk Control

BW incorporates E&S requirements into its standard contract templates on a prospective basis - for new contracts and, where reasonably practicable, on renewal or material amendment - proportionate to the nature and risks of each engagement.

- **Construction supervision:** Monitoring and reporting of EHS performance on site, including material community health and safety risks associated with BW-controlled construction activities.
- **Construction contractors:** Compliance with applicable EHS law and the BW OHSE Site Management Plan; community health and safety requirements; responsibility for subcontractors they engage; provision of a grievance channel for their workers; and compliance with BW's minimum accommodation standards where worker accommodation is provided.
- **Construction worker contract:** The Worker Code of Conduct, included or incorporated by reference, covering site rules and safe working practices, respectful conduct toward other workers and the surrounding community, prohibition of harassment, gender-based violence (GBV) and sexual exploitation, abuse and harassment (SEA/SH), and access to available grievance channels.
- **Facility management contract:** Monitoring and reporting on material EHS and social matters within the facility manager's scope of services, and first-line receipt of concerns raised at site level.
- **Lease contract:** Compliance with applicable EHS law and relevant BW requirements, and provision to BW, where reasonably required, of material EHS information or regulatory reports relating to the leased premises.
- **Solar PV supplier contract:** Labor and working-condition provisions for material solar PV suppliers directly engaged by BW, including prohibition of forced labor and harmful or exploitative child labor.

Where a material E&S risk cannot be adequately managed through standard controls, the responsible function shall document the risk, proposed mitigation measures and responsible owner, and escalate the matter for appropriate review and decision. Any suspension or restriction of activities shall be subject to applicable law, BW's contractual rights and operational control.

3.3 Management Programs

This Section describes the plans and procedures BW uses to manage the material E&S risks and impacts identified under Section 3.2, so far as they are within BW's reasonable control.

(i) Investment & Land acquisition

- a. **Site selection and land acquisition.** Land is typically acquired and cleared by the State before being leased to BW, either directly or through an industrial park developer. Where BW's own activities would require occupied land, BW seeks to avoid displacement through site selection and project design. Where displacement cannot be avoided, BW ensures that affected persons are compensated and assisted in accordance with Vietnamese law and any additional requirements agreed under the applicable investor or lender arrangements before the relevant works proceed. Legacy land issues are addressed under Section 3.2(ii).
- b. **Protected areas and cultural heritage.** Sites within an area legally protected for biodiversity are outside BW's investment scope, and proximity to a protected biodiversity or cultural heritage area is a screening

criterion. Where a site adjoins such an area, the mitigation hierarchy is applied through site selection and layout and carried into the design brief.

(ii) Pre-construction and construction

- a. **Design and licensing.** Facilities are designed to the applicable Vietnamese technical regulations and to BW's own design standards. BW obtains the environmental licenses, approvals and EIA decisions required before construction commences.
- b. **Construction EHS.** The BW OHSE Site Management Plan sets the minimum EHS requirements for contractors and their subcontractors, covering induction, risk assessments and method statements, permits to work, high-risk activity controls, materials and waste handling and emergency arrangements. Each contractor's HSE, emergency response, fire and traffic management plans are reviewed before mobilization and monitored during the works.
- c. **Labor on site.** Contractors are required to engage workers on written contracts, to comply with the law on wages, hours, rest, social insurance and occupational health, to verify worker age and to apply the Worker Code of Conduct. The grievance channels are available to contracted workers. Contractors are expected to communicate accessible grievance channels to their workers and subcontractors, prohibit gender-based violence and sexual exploitation, abuse and harassment, and apply proportionate worker accommodation safeguards where accommodation is provided.
- d. **Community health and safety.** Sites are secured, fenced and signed; traffic routes, timing and speed limits are managed under a traffic management plan; and dust, noise and drainage are controlled, with monitoring where environmental approval or the law requires it.
- e. **Environmental controls.** Vegetation disturbance is minimized, topsoil is reinstated and site drainage is managed; waste is transferred only to licensed handlers.

(iii) Operation and Leasing

- a. **Pollution, waste and wastewater.** BW holds and complies with the environmental licenses applicable to each operating site and submits the periodic environmental protection reports required by law. Wastewater is discharged only to permitted points and within permitted limits; waste is transferred only to licensed handlers, with manifests retained.
- b. **Resource efficiency and emissions.** BW monitors the electricity and water consumed in the areas it controls and in the common areas, and the rooftop solar installed and generated, and pursues efficiency measures where commercially viable and technically feasible. Tenant-controlled consumption is reported separately where the data is available to BW.
- c. **Estate safety.** Estate traffic, parking and lighting are managed; fire systems are maintained, inspected and tested; fire drills are conducted and recorded; and the infrastructure built for the project is inspected and maintained.
- d. **Tenant management.** BW does not control its tenants' processes, equipment, chemicals or workforce within leased premises. It manages the relationship through E&S screening before the lease; the EHS obligations, permitted use clause and right of access in the lease; the Tenant Code of Conduct; and periodic monitoring of observable EHS matters.

Two programs apply across both construction and operation: security management, under which security personnel operate to a documented procedure and, where provided by a third party, BW makes reasonable

efforts to ensure that force is used only where strictly necessary and proportionate, that personnel are trained on conduct and on the use of force, and that incidents are recorded and investigated; and labor and working conditions for BW's own workforce, employed on written contracts and managed under the Internal Labor Regulations, the Collective Labor Agreement and the Employee Handbook.

(iv) Corrective action tracking

Material E&S incidents, significant non-compliances and recurring findings shall be recorded with proportionate corrective and preventive actions, responsible persons and target completion dates. The relevant function shall verify closure and escalate overdue or ineffective actions according to their severity.

3.4 Emergency Preparedness and Response

BW maintains emergency preparedness and response arrangements for the activities within its operational control - construction sites, operating assets and common areas - and coordinates with the parties who control the rest: tenants within their premises, industrial park developers for park-wide infrastructure, and the public emergency services.

Construction

BW maintains an Emergency Preparedness and Response Plan, supported by each contractor's own emergency response, fire prevention and fighting and first aid plans, and by the BW Emergency Response Procedure with its injury treatment flowchart, injury matrix and project emergency contact list. Appropriately for the nature and risks of the work, the plan covers:

- the reasonably foreseeable emergency scenarios on a construction site - fire and explosion, structural or excavation collapse, fall from height, lifting failure, electrocution, chemical or fuel release, serious injury or fatality, traffic incident, and severe weather or flood;
- the resources required, including firefighting and first aid equipment, trained first aiders, spill response materials, evacuation routes and assembly points, alarm and communication equipment, and transport to the designated medical facility;
- roles and responsibilities, including the site emergency controller, the contractor's firefighting and emergency response teams, first aiders and wardens, and the escalation route to BW;
- the project emergency contact list, maintained current for each site;
- training at induction for every person entering the site, and specific training for the response teams; and
- a program of drills at defined intervals, each recorded, evaluated and followed by corrective actions tracked to closure.

Operation

BW maintains an Emergency Response Plan for each facility, covering fire safety and reasonably foreseeable natural hazards, including flooding, typhoons and extreme heat, as appropriate to the location. Fire detection, alarm and suppression systems are maintained and tested, fire drills are conducted and recorded, and evacuation routes and assembly points are maintained, in coordination with the industrial park developer and the local fire authority, as applicable.

Each tenant is required by the Tenant Code of Conduct to prepare and maintain a fire prevention and fighting plan for its premises, to maintain and inspect its fire equipment and to control hot work. BW coordinates site-wide drills and communicates the site emergency arrangements to tenants.

Incident reporting and investigation

Incidents and near misses occurring at BW-controlled sites are reported and recorded in accordance with applicable site reporting procedures. Where the actual or potential severity warrants, incidents are investigated to identify root causes, with appropriate corrective actions assigned and tracked to closure. Injuries are classified using the injury matrix.

A fatality; an injury with a reasonable likelihood of death or permanent disability; multiple serious injuries; a major fire; a structural collapse; a significant uncontrolled release to the environment; or an event causing material harm or disruption to the surrounding community shall be promptly escalated, upon becoming known to BW, to the HSE Manager (construction sites) or the Facilities Manager (operating assets) and to Senior Management. Notifications to competent authorities and relevant investors or lenders are made in accordance with applicable law and the relevant investment or financing arrangements.

3.5 Stakeholder Engagement

BW engages with the people and bodies affected by, or with a legitimate interest in, its activities, proportionately to the nature and significance of the relevant E&S risks and impacts.

Stakeholder group	Interest	How BW engages
Employees	Employment conditions, health and safety, ethics and conduct	Line management; Human Resources; the Collective Labor Agreement and employee representation; training; the ESG mailbox and whistleblower channel
Workers engaged by contractors	Health and safety, wages, hours, treatment on site	The site grievance channel displayed on site; the Worker Code of Conduct; contractor management meetings
Tenants	EHS obligations, estate management, fitting out, emergency arrangements, utilities	Leasing and Key Account relationship management; the Tenant Code of Conduct; the facility manager; tenant meetings and communications; handover and renewal
Neighboring communities and occupiers	Construction nuisance, traffic, dust, noise, drainage, emergency events; land matters where relevant	Site notices with a named contact point; the external grievance channel; engagement with the commune or ward authority; meetings where a specific issue arises
Industrial Park developers	Shared infrastructure, wastewater, roads, fire and security, park rules	Operational coordination; incident notification; joint drills where applicable

Stakeholder group	Interest	How BW engages
National, provincial and local authorities	Permits, licenses, EIA conditions, inspections, statutory reporting	Government Liaison, Project & Construction, Facility Management and Legal; statutory submissions; inspections and responses; timely submission of documents to obtain permits
Contractors, consultants and suppliers	EHS requirements, conduct standards, performance	Prequalification; contract; site meetings; performance review
Investors, lenders and shareholders	E&S performance, ESAP implementation, disclosure	The annual ESG Report; the annual ES Monitoring Report; investor reporting and meetings

3.6 External Communications and Grievances Mechanism

A two-tiered grievance redress mechanism operates at site and corporate levels, covering environmental, health and safety, and social concerns raised by tenants, neighboring communities, authorities, workers of contractors and subcontractors at BW-controlled sites, and other external stakeholders. Site-level grievance contacts are communicated to relevant contractors for dissemination to their workers before construction mobilization.

(i) Principles

- **Accessible** - multiple channels, in Vietnamese and English, are available without charge and publicized through appropriate means, including site notice boards or BW's website. Workers of contractors and subcontractors at BW-controlled sites are informed of available grievance channels through their contractors.
- **Culturally and linguistically appropriate** - communications with affected communities are in Vietnamese and in plain language and are made through means the community uses.
- **Anonymous** where the person wishes - anonymous submissions are accepted through available channels that permit anonymous reporting.
- **Confidential** - The identity of a complainant is disclosed only to those who need it to handle the matter, and personal data is handled in accordance with applicable Vietnamese data protection laws. Sensitive grievances, including harassment, gender-based violence (GBV) and sexual exploitation, abuse and harassment (SEA/SH), are handled confidentially, with restricted access to information and appropriate referrals where necessary.
- **Without retaliation** - no person who raises concern in good faith is subject to reprisal.
- **Without prejudice** - using the mechanism does not require the person to waive any rights and does not impede access to judicial or administrative remedies, to any accountability or grievance mechanism made

available by a relevant investor or lender (if any), or to any other dispute resolution mechanism the person trusts.

(ii) Grievance mechanism

BW maintains the following channels through which concerns may be raised:

- **SOS Committee.** A standing internal committee that receives and handles employee concerns relating to the workplace, welfare and conduct.
- **Compliance mailbox** (compliance@bwidjsc.com). For reports of suspected breaches of law or of BW's internal policies, including the Code of Ethics and the anti-bribery policy. The channel is open both to BW personnel and to external parties, including contractors, suppliers and other business partners.
- **ESG mailbox and hotline.** For environmental, social and governance concerns. The contact details - esg@bwidjsc.com - are published on BW's website. The channel is open not only to BW employees but also to workers engaged by contractors on BW sites, to tenants, and to members of the surrounding community.
- **Site-level contact.** The BW site representative during construction and the facility manager during operation, displayed on site and communicated at induction.

(iii) Procedure

Site notices and site-level grievance channels are established before construction mobilization at BW-controlled sites. Grievances are handled in accordance with the following indicative procedure:

Step	What happens	Indicative time
Receive and log	Record the concern in the grievance register, including the date, channel, location, description, category and complainant's details, if provided	Same or next working day
Acknowledge	Acknowledge receipt, identify the responsible contact and indicate the expected response timeframe, where contact details are available.	Within 5 working days
Assess and assign	Assess the nature and severity of the concern and assign it to the responsible function	Within 7 working days
Investigate	Conduct a proportionate investigation, including site inspection, document review or interviews, as appropriate	Within 28 working days, or longer with an interim response explaining the delay and offering a revised date
Resolve and respond	Record and implement appropriate corrective actions and communicate the outcome to the complainant, where contact details are available	Promptly on completion

Step	What happens	Indicative time
Close and review	Record closure and any outstanding matters. Escalate material unresolved grievances to Senior Management as appropriate	Reviewed quarterly

3.7 E&S Disclosure and Reporting to Affected Communities

BW publishes the following on its website and keeps the information reasonably up to date:

- this ESGMS and its Vietnamese executive summary;
- E&S action plans agreed with relevant investors or lenders, and their Vietnamese executive summaries, where disclosure is required under the applicable arrangements;
- a brief description of, and a link to, any applicable accountability or grievance mechanism made available by a relevant investor or lender, with relevant information in Vietnamese;
- BW's grievance contact details and how to use the grievance mechanism;
- the annual ESG Report, including anonymised, aggregate information on material grievances and their resolution, as appropriate; and
- a high-level summary of material E&S information relating to BW's operating assets and assets under development, where appropriate.

Disclosure is subject to applicable law, confidentiality obligations, personal data protection requirements and the protection of commercially sensitive information. Any decision to withhold information on these grounds is made on a reasoned basis.

Where BW's activities give rise to material E&S risks or impacts affecting a surrounding community, BW provides proportionate updates to the affected community on relevant monitoring results and mitigation measures, taking into account the nature and significance of the risks or impacts. Communications are conducted in Vietnamese, in plain language, and appropriately documented.

3.8 Monitoring and Management Review

(i) Monitoring

BW monitors its E&S performance on a basis proportionate to materiality and to the availability of reliable data. Monitoring covers environmental permits and compliance, occupational health and safety on construction sites, incidents and corrective actions, labor and working conditions, the screening and due diligence of new investments, grievances, and resource use at the assets BW controls. Data is collected at site and function level and consolidated by the Sustainability Team. Matters arising inside tenant premises are monitored only where the information is available to BW and are identified as tenant controlled.

Monitoring is based on the indicators set out in Annex C, which are consolidated and reported annually, subject to reliable data availability and applicable investor or lender requirements.

(ii) Management Review

At least annually, the Sustainability Team reviews material E&S matters and reports its findings and proposed actions to Senior Management. The CEO reports material conclusions and proposed actions to the Board of Directors for oversight.

The annual review considers:

- incidents, their root causes and the effectiveness of corrective actions;
- grievances received, their categories and any systemic issues identified;
- the E&S risk register and any new or changed material risks;
- changes in applicable law and BW's business, including new locations, asset types or tenant sectors;
- the adequacy of resources, organizational capacity and competency; and
- whether the ESGMS and its supporting procedures remain fit for purpose.

(iii) Reporting to Investors and Lenders

Where required under an applicable ESAP or investment or financing arrangement, BW provides the relevant investor or lender with periodic E&S monitoring reports in the form and within the timeframe agreed with that party. Such reports are based on information reasonably available to BW and focus on material E&S risks, incidents, performance and implementation of the ESGMS and applicable action plans. Where an annual ES Monitoring Report is required, BW provides it within the timeframe agreed with the relevant investor or lender, as recorded in Annex B.

Annex A – Exclusion List

BW and its controlled entities shall not knowingly undertake or directly finance any excluded activity in their own investments. For the avoidance of doubt, this commitment applies to BW's own investments. BW shall not be deemed in breach solely due to excluded activities undertaken by independent third parties (including tenants), or to passive, de minimis or ordinary-course treasury investments - including listed securities or pooled funds - where BW does not control or materially influence the underlying activity.

The BW Exclusion List comprises activities and items prohibited under applicable law and any additional exclusion categories adopted by BW or agreed with relevant investors or lenders. This includes, where applicable, the AIIB Environmental and Social Exclusion List (2024), subject to any qualifications agreed for the relevant AIIB investment.

[Annex A to be completed with the agreed BW Exclusion List and applicable investor-specific qualifications before public disclosure.]

Annex B – Investor and Lender Requirements

This Annex summarizes requirements agreed with individual investors or lenders that apply in addition to the general provisions of this ESGMS. It is updated when an arrangement is agreed, amended or ends, without amending the core text of the ESGMS. Where this Annex and the core text differ, this Annex applies to the relevant investor or lender for the duration of its arrangement.

Requirement	Asian Infrastructure Investment Bank (AIIB)
Nature of arrangement	Proposed equity investment in BW, subject to AIIB approval.
Applicable E&S standards	AIIB Environmental and Social Framework (June 2024), including the Environmental and Social Policy and, where applicable, Environmental and Social Standard 1 (Environmental and Social Assessment and Management), Standard 2 (Land Acquisition and Involuntary Resettlement) and Standard 3 (Indigenous Peoples).
Other agreed policies	AIIB Policy on Prohibited Practices, Procurement Policy and Operational Policy on International Relations, in the form agreed in the transaction documents.
Action plan	Environmental and Social Action Plan (ESAP) agreed between BW and AIIB, dated [date].
Exclusion list	AIIB Environmental and Social Exclusion List (2024), as set out in Annex A, subject to the qualifications in ESAP item 2(ii).
Categorization	AIIB has provisionally assigned the investment Category B. BW's internal risk ratings under Section 3.2(i)(b) do not change AIIB's categorization. [Where a new investment is rated High, BW informs AIIB.] [To be agreed]
Review of past land acquisition	As set out in Section 3.2(ii) and ESAP item 3(ii): land acquired by the Government and handed over directly to BW or its controlled entities, excluding land within established industrial parks. Where a material legacy issue is identified, BW discusses appropriate measures with AIIB.
Indigenous Peoples	Where ESS3 applies, meaningful consultation and, in the circumstances specified in ESS3, free, prior and informed consultation (FPICon) and the broad support of the affected communities (Section 3.2(i), ESAP item 3(i)).
Prohibited Practices and debarment screening	Onboarding screening of designated direct counterparties against the AIIB debarment list, as set out in Section 3.2(iv) and ESAP item 3(iv).
International relations	BW informs AIIB where screening identifies a potential significant impact on an International Waterway (Section 3.2(iii), ESAP item 3(iii)).

Requirement	Asian Infrastructure Investment Bank (AIIB)
	[BW does not acquire land or make new investments in an area subject to an international territorial dispute. If an area becomes disputed after BW has invested, BW and AIIB discuss the appropriate course of action.] [To be confirmed against the transaction documents]
Accountability mechanism	AIIB Project-affected People's Mechanism (PPM). A description of, and link to, the PPM is published on BW's website (ESAP item 5(i)), in English and Vietnamese: [link to be confirmed].
Monitoring and reporting	Annual ES Monitoring Report using the template agreed between BW and AIIB, within [90] days after the end of each calendar year (ESAP item 6), using the indicators in Annex C.
Disclosure	Draft ESGMS and ESAP published on BW's website, [together with the Stakeholder Engagement Framework (SEF) and a Vietnamese executive summary of the ESGMS and ESAP], and a high-level summary of material E&S information relating to BW's operating assets and assets under development (ESAP item 5(ii)).
Key dates	Draft ESGMS published no later than 18 October 2026. Final ESGMS approved, effective and communicated to the relevant BW units on or before the first disbursement (ESAP item 1).

Additional investors or lenders are added as further columns once their arrangements are agreed. Items in square brackets are to be confirmed before publication.

Annex C – E&S Monitoring Indicators

BW reports the indicators below annually for BW Operations, in its ESG Report and in E&S monitoring reports to investors and lenders, using the format agreed with each party. Data for areas under tenant control is reported separately where it is available to BW and is identified as tenant controlled. Indicators are defined consistently with the GRI Standards where practicable and are refined as BW's data systems develop.

Area	Indicator	Unit	Coverage
Health and safety	Fatalities	Number	BW employees and contractor workers at BW-controlled sites
	Lost-time injuries	Number; rate per 1,000,000 hours worked where hours are available	BW employees and contractor workers at BW-controlled sites
	Serious incidents notified under Section 3.4	Number	BW-controlled sites
	Fire and emergency drills conducted	Number	Construction sites and operating assets
Labor and people	Employees by gender, including senior management	Number; %	BW employees
	ESG and compliance training completion	% of employees	BW employees
	Construction sites where Worker Code of Conduct induction is in place	Number; % of active sites	BW construction sites
	Grievances received, by category and channel	Number	All channels in Section 3.6
	Grievances closed within the indicative timeframe	%	All channels in Section 3.6
	Reports of GBV or SEA/SH	Number (aggregate only)	All channels in Section 3.6
Environment and compliance	Environmental non-compliances, penalties or notices from authorities	Number	BW Operations

Area	Indicator	Unit	Coverage
	Periodic environmental protection reports submitted on time	%	Operating assets
Resource use and climate	Electricity consumption	kWh	Areas within BW's operational control
	Water consumption	m ³	Areas within BW's operational control
	Waste generated, by disposal route where available	Tonnes	Areas within BW's operational control
	Rooftop solar installed capacity and generation	MWp; MWh	Portfolio
	Scope 1 and Scope 2 GHG emissions	tCO ₂ e	BW Operations, from the baseline year once established
	Green building certified floor area	m ² ; % of portfolio	Portfolio
Investment screening	New investments screened, by BW risk rating	Number	New investments
	New investments with a positive Indigenous Peoples or International Waterway screen	Number	New investments
	New designated counterparties screened against applicable debarment lists	% of new counterparties	Counterparties under Section 3.2(iv)

Where an investor or lender has agreed a specific reporting template, BW maps these indicators to that template, as recorded in Annex B.