Scala Datacenter Expansion – BRAZIL
Environmental and Social Action Plan (ESAP)

No.	Aspect	Action	Product	Delivery date
ND 1: Assessment and Management of Environmental and Social Risks				
1.1	Environmental Licenses	1. Develop and keep updated a matrix that summarizes the status of obtaining the environmental and social licenses and authorizations required for all assets by applicable local regulations.	1. Matrix of Environmental and Social Licenses and Authorizations.	1. As a condition for the First Disbursement, and then as part of the Environmental and Social Compliance Report (RCAS).
1.2	Environmental and Social Management System	1. Keep the Integrated Matrix of Environmental, Social and Occupational Health and Safety Risks and Impacts up to date, specific to assets, including direct, indirect, cumulative and climate impacts.	1. Updated environmental, social, health and safety risk matrix.	1. As part of RCAS.
		2. Present evidence of implementation of the Integrated E&S Management System (“ESMS”).	2. Evidence of IMS implementation.	2. As part of RCAS.
		3. Present contractual clauses in the contracts of contractors and subcontractors related to environmental, social, health and safety issues.	3. Evidence of contractual clauses.	3. As part of RCAS.
1.3	Organizational capacity and competency	1. Present evidence of continuous training for direct and outsourced employees.	1. Evidence of continuous capacity building.	1. As part of RCAS.
1.4	Cumulative Impact Assessment	1. Prepare cumulative impact assessment for assets.	1. Assessment of cumulative impacts.	1. Within 9 months of First Disbursement.
1.5	Analysis of Alternatives	1. Present evidence of implementation of the general guidelines, when applicable, which include: i) an analysis of alternatives, ii) the application of the mitigation hierarchy, iii) consultation procedures with potentially affected communities, iv) contractual requirements for the executing companies, and v) requirements for the preparation of specific socio-environmental management plans for each new project.	1. Evidence of implementation of the Area Screening and Selection Procedure, where applicable.	1. As part of RCAS.
1.6	Gender Programs	1. Develop a program that includes: (i) diagnosis and mapping. Include assessment of possible risks based on gender-based violence; (ii) attraction and hiring; (iii) retention; (iv) development; (v) progression and leadership; (vi) monitoring and continuous improvement.	1. Gender program.	1. Within 12 months of First Disbursement, and as part of RCAS.
1.7	Emergency Preparedness and Response	1. Update, when necessary, and present evidence of implementation of the Emergency Preparedness and Response and Risk Management Plan, considering extreme weather events.	1. Evidence from the Emergency Preparedness and Response and Risk Management Plan.	1. As part of RCAS.
1.8	Stakeholder Engagement Plan (“SEP”)	1. Present evidence of implementation and updating, when necessary, of the SEP specific to each asset.	1. Evidence of SEP implementation.	1. As part of RCAS.
1.9	External Communication and Grievances Mechanism	1. Present evidence of the existing grievance mechanism, and update when necessary, so that: i) it differentiates between social and environmental complaints, ethical complaints, requests for information, and emergency communications; ii) it classifies cases according to theme, severity, and urgency; iii) it establishes responsible parties and response deadlines; iv) it allows for follow-up and appeal; v) it ensures anonymity, confidentiality, and protection against retaliation; and vi) it uses the results to review risks, impacts, controls, and management programs.	1. Evidence of the updated Grievances and Grievances Procedure.	1. As part of RCAS.
ND 2: Labor and Working Conditions				
2.1	Occupational Health and Safety	1. Present evidence of the occupational risk management system and occupational health medical control associated with construction and operation activities, which includes: i) a performance evaluation for own and outsourced personnel; ii) statistics of (a) lost-time accidents, (b) number of days lost, (c) lost-time accident frequency rate, (d) lost-time accident severity rate, (e) fatalities, (f) vehicular accidents; and iii) for serious accidents involving loss of work capacity or fatalities, the causes and the measures to be adopted to correct them.	1. Implementation evidence and statistical data.	1. As part of RCAS.

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2.2	Grievance mechanism	1. Maintain an updated matrix of complaints for own and subcontracted workers, indicating, among other aspects: i) the numbers of complaints received; ii) the typologies; iii) the deadlines for resolution; iv) any recurring topics; and v) the corrective measures adopted.	1. Matrix of workers' complaints.	1. As part of RCAS.
ND 3: Resource Efficiency and Pollution Prevention				
3.1	Greenhouse gases (GHG).	1. Present greenhouse gas inventories considering the set of assets of the Project.	1. GHG emissions report.	1. As part of RCAS.
3.2	Resource Efficiency	1. Present evidence of the measures to reduce drinking water consumption at the SGRUTB01 facility.	1. Evidence of actions to reduce drinking water consumption.	1. As part of RCAS.
3.3	Pollution Prevention	1. Maintain and execute the existing Environmental Management Program, sending evidence when requested and ensuring its effective implementation and continuous updating, including i) procedures for handling management of hazardous materials, waste, noise, effluents, and atmospheric emissions; ii) a monitoring plan; iii) the definition of parameters, frequency, and monitoring points; iii) performance indicators and reference limits; v) instructions for recording monitoring and preparing periodic reports; and vi) procedures for managing deviations and corrective actions.	1. Present evidence of the Environmental Management Program.	1. as part of RCAS.
ND 4: Community Health, Safety and Security				
4.1	Equipment Safety	1. Maintain, and update, when necessary, hazard and risk analysis, including, where relevant; assessments (a) risk identification (HAZID), (b) operational risk identification (HAZOP), (c) quantitative risk assessment (QRA) or (d) fire safety studies.	1. Evidence from hazard and risk analysis	1. As part of RCAS, where applicable.
4.2	Security Personnel	1. Present evidence of implementation of existing Safety Management procedures.	1. Evidence of Safety Management	1. As part of RCAS.
ND 7: Indigenous Peoples				
4.3	Avoidance of Adverse Impacts	1. Maintain the screening and selection procedure for new areas, to include, where applicable: i) the presence of indigenous peoples, quilombola communities and other traditional communities in the project's area of influence; ii) the potential impacts of the project on the rights, territories, resources, livelihoods, health, safety, culture and heritage of indigenous communities;	1. Present evidence of the updated New Area Screening and Selection Procedure.	1. As part of RCAS, if triggered.
ND 8: Cultural Heritage				
4.4	Procedures in case of Chance Find Procedures	1. Maintain the screening and selecting procedures for new areas with historical, cultural o archaeological potential, to include, when applicable: i) consultations with official bases, competent authorities, and potentially affected communities; ii) evaluation processes, by qualified professionals; iii) requirements for the application of the mitigation hierarchy; iv) requirements for carrying out informed consultations; v) a procedure for fortuitous discoveries; and vi) specific management, monitoring, and community access measures when material risks or impacts are identified.	1. Present evidence of the updated New Area Screening and Selection Procedure.	1. As part of RCAS, if triggered.