

TCP PORT EXPANSION PROGRAM – URUGUAY
Environmental and Social Action Plan – ESAP

| No. | Aspect | Action | Product | Delivery date |
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| PS1: Assessment and Management of E&S Risks and Impacts | | | | |
| 1.1 | Integrated Management System | <ol style="list-style-type: none"> 1. Incorporate personnel to the Integrated Environmental, Health and Safety System of TCP (IMS). <ol style="list-style-type: none"> a) For the direct management of the Project, incorporate the following professionals as permanent TCP staff : i) an Environmental, Social and Health and Safety Coordinator under the IMS, who will report to the Project Manager, TCP's General Manager (if necessary), the IMS Leader (a position originally created for the operation of the terminal) and will act as technical counterparty to the Project's financing institutions and E&S consultant ; ii) a full-time semi-senior Health and Safety professional, who will report to the Environmental, Social and Health and Safety Coordinator of the Project's IMS; iii) a part-time semi-senior Environmental professional to support TCP's Project Manager in supervising and controlling E&S aspects during construction works and potentially report any construction issues which could impact on the terminal operation. The Project's General Manager will be additionally assisted by an external E&S consultant. b) For the operation of the terminal, TCP will incorporate the following professionals, who will report directly to the IMS Leader: i) a full-time senior Health and Safety professional to act in the terminal's operation and support TCP's Project Manager during the construction works; ii) a full-time Health and Safety technician to act in the operation of the terminal and support TCP's Project Manager during the construction works; and iii) a full time semi-senior Environmental professional to supervise and control the E&S aspects of the terminal's operation and, if necessary, report on any construction issue that could impact on its operation. 2. Incorporate the following to TCP's IMS as documented plans, programs or procedures: i) the procedures in the Construction E&S Plan; ii) the requirements of the Health and Safety Plan approved by the MTSS; iii) the requirements in the Project's Environmental and Social Action Plan. | <ol style="list-style-type: none"> 1. Incorporation of environmental, social, and health and safety personnel to TCP's EHSS Integrated System 2. Incorporation of new plans, programs or procedures to the IMS | <ol style="list-style-type: none"> 1. Two months after the first disbursement 2. Four months after the first disbursement |
| 1.2 | Environmental, Social, Health and Safety Policy | <ol style="list-style-type: none"> 1. Prepare a Project-specific Environmental, Social, Health and Safety Policy considering the Company's values, legal compliance, specific EHS requirements from the financing entities and which explicitly include the principles that no type of discrimination will be accepted and the importance of managing gender and climate change risks, among other aspects. | <ol style="list-style-type: none"> 1. Preparation of the Environmental, Social, Health and Safety Policy | <ol style="list-style-type: none"> 1. Two months after the first disbursement |

| No. | Aspect | Action | Product | Delivery date |
|-----|---|--|--|---|
| | | 2. Implement a Project-specific Environmental, Social, Health and Safety Policy. | 2. Evidence of implementation | 2. Periodically, in the Environmental and Social Compliance Reports (ESCRs) |
| 1.3 | Identification of environmental and social aspects, occupational risks and legal issues | 1. Through matrixes, identify and assess the E&S aspects of the Project, as well as its occupational hazards and legal aspects (required by current legislation and the financing entities). | 1. Identification matrixes | 1. Two months after the first disbursement |
| | | 2. Use the identification and assessment matrixes on an ongoing basis. | 2. Evidence of implementation | 2. Periodically in the ESCRs |
| 1.4 | Gender risks | 1. Prepare an IMS-specific procedure to prevent harassment at the workplace incorporating the contents of the manual already drafted by TCP in this regard. | 1. Procedure to prevent harassment at the workplace | 1. Three months after the first disbursement |
| | | 2. Implement the procedure to prevent harassment at the workplace. | 2. Evidence of implementation | 2. Periodically in the ESCRs |
| 1.5 | Training | 3. Draft EHS training plans as part of the IMS. Such training plans should cover the following issues, among others: i) contents of the Construction E&S Management Plan; ii) contents of the Health and Safety Plan of the Project; iii) safe vehicle driving and use of machinery inside and out of the work fronts; and iv) if necessary, issues related to the E&S requirements from the agencies financing the Project. | 1. EHS training plans | 1. The first bi-annual training plan, three months after the first disbursement; later, bi-annually |
| | | 1. Implement the training plans. | 2. Evidence of implementation | 2. Periodically in the ESCRs |
| 1.6 | Emergency Management | 1. Prepare an Emergency and Preparedness Response Plan incorporated into the IMS for the Project's land facilities making sure that it is consistent with the Emergency Plan in place for the operational area. | 1. Project Emergency Preparedness and Response Plan | 1. Three months after the first disbursement |
| | | 2. Implement the Emergency Preparedness and Response Plan. | 2. Evidence of implementation | 2. Periodically in the ESCRs |
| | | 3. Validate the emergency plans of the main contractor and its subcontractors (including the plans applicable to the aquatic area) in order to ensure their alignment and coordination with the prevention and emergency plans in the IMS. | 3. Emergency plans of the main contractor and its validated subcontractors | 3. Prior to the first disbursement |

| No. | Aspect | Action | Product | Delivery date |
|------|---|--|--|--|
| | | 4. Monitor the implementation of the emergency plans of the main contractor and its subcontractors. | 4. Evidence of implementation | 4. Periodically in the ESCRs |
| 1.7 | Accident Management | 1. Prepare a specific accident management procedure as part of the IMS applicable in the realm of the Project; such procedure should be compulsory for payroll and hired employees and should: i) ensure that the legal requirements included in the Health and Safety Plan are met; ii) identify the responsibilities and actions to be immediately carried out once the accident has taken place; iii) include instructions to report the accident, record its nature and magnitude, and any formalities related to basic legal aspects; iv) include the formats to prepare accident investigation reports; and vi) include the formats to identify and implement the preventive or corrective measures to be adopted in order to prevent the accident from happening again. | 1. Accidents Management Procedures | 1. Four months after the first disbursement |
| | | 2. Implement the specific accident management procedure. | 2. Evidence of implementation | 2. Periodically in the ESCRs |
| 1.8 | Project Environmental, Social, and Health and Safety Monitoring | 1. Prepare an Environmental, Social, and Health and Safety Monitoring Plan for the Project and as part of the IMS, which includes the follow up of the parameters in the Construction E&S Management Plan and the Project Health and Safety Plan and ensures that the caps of the parameters included in the Plan are not over the allowed values specified in the Project's E&S requirements. | 1. Project Environmental, Social, and Health and Safety Monitoring Plan | 1. Four months after the first disbursement |
| | | 2. Implement the Project Environmental, Social, and Health and Safety Monitoring Plan | 2. Evidence of implementation | 2. Periodically in the ESCRs |
| 1.9 | Stakeholder Engagement | 1. Integrate the Stakeholders Engagement Plan into the IMS. | 1. Stakeholder Engagement Plan integrated into the Environmental, Social, and Health and Safety System | 1. Three months after the first disbursement |
| | | 2. Implement the Stakeholders Engagement Plan. | 2. Evidence of implementation | 2. Periodically in the ESCRs |
| 1.10 | Third-Party Grievance Reception and Resolution | 1. Prepare a specific third-party grievances and claims reception and resolution procedure as part of the IMS, that: i) includes the possibility of capturing claims anonymously; ii) establishes the parties in charge of its management; iii) determines the assessment and response terms; iv) clearly establishes the assignment of responsibilities for TCP's personnel and each contractor for its management; and v) includes ways of recording and monitoring the claims. | 1. Third-party grievances and claims reception and resolution procedure 2. | 1. Four months after the first disbursement |

| No. | Aspect | Action | Product | Delivery date |
|--|---|--|---|--|
| | | 2. Implement the third-party grievances and claims reception and resolution procedure. | 3. Evidence of implementation | 2. Periodically in the ESCRs |
| PS 2. Labor and Working Conditions | | | | |
| 2.1 | Project Human Resources Policy | 1. Prepare a Human Resources Policy for the Project; such policy will be applicable to its own personnel and hired personnel, and will be aligned with the legal requirements and standards required by the Project financing entities. | 1. Human Resources Policy | 1. Two months after the first disbursement |
| | | 2. Implement the Project Human Resources Policy. | 3. Evidence of implementation | 2. Periodically in the ESCRs |
| 2.2 | Retrenchment | 1. Prepare a personnel demobilization plan which: i) proposes retrenchment alternatives; ii) meets all the legal and contractual requirements; and iii) mitigates any adverse impacts of the retrenchment actions. | 1. Personnel Demobilization Plan | 1. Six months prior to Project physical completion date |
| | | 2. Implement the Personnel Demobilization Plan. | 2. Evidence of implementation | 2. Periodically in the ESCRs |
| 2.3 | Internal Grievance and Claim Reception and Resolution Mechanism | 1. As part of the IMS, prepare a specific procedure to receive and resolve any grievances and claims from TCP's payroll, contracted or subcontracted personnel, which: i) includes the possibility of capturing claims anonymously; ii) establishes the parties in charge of its management; iii) determines the assessment and response terms; iv) clearly establishes the assignment of responsibilities for TCP's personnel and each contractor for its management; and v) includes ways of recording and following up on the claims. | 1. Procedure to receive and resolve personnel grievances and claims | 1. Four months after the first disbursement |
| | | 2. Implement the Procedure to receive and resolve grievances and claims from payroll, contracted and subcontracted personnel. | 2. Evidence of implementation | 2. Periodically in the ESCRs |
| 2.4 | Facilities for persons with some degree of disability | 1. Provide the adequate facilities to allow people with a certain degree of disability to work at or move around the Project area. | 1. Facilities for persons with some degree of disability | 1. Six months after the first disbursement |
| PS3: Resource Efficiency and Pollution Prevention | | | | |
| 3.1 | Greenhouse gases | 1. Calculate GHG emissions for the closing year. | 1. GHG emissions calculation | 1. In the second ESCR of the year following the closing year |
| | | 2. Estimate the emissions to be generated the following year. | 2. GHG emissions estimation | 2. In the last-but-one ESCR of the current year |

| No. | Aspect | Action | Product | Delivery date |
|---|---------------------------------|---|--|---|
| 3.2 | Water and Power Consumption | 1. Prepare, as part of the IMS, a program to optimize the use of water and energy including objectives, terms and assignment of responsibilities, and to record monthly consumption of water and energy (UTE network and works generators). | 1. Program to optimize the use of water and energy | 1. Four months after the first disbursement |
| | | 2. Implement the program to optimize the use of water and energy. | 2. Evidence of implementation | 2. Periodically in the ESCRs |
| 3.3 | Waste Management | 1. Draft an IMS-specific procedure to manage waste (generated on land and on in the water) incorporating the measures in the Construction E&S Management Plan and those required by the Project's financing entities. | 1. Waste management procedure | 1. Four months after the first disbursement |
| | | 2. Implement the specific waste management procedure. | 2. Evidence of implementation | 2. Periodically in the ESCRs |
| 3.4 | Management of liquid effluents | 1. Draft an IMS-specific procedure to manage liquid effluents incorporating the measures in the Construction E&S Management Plan and those required by the Project's financing entities. | 1. Liquid Effluents Management Plan | 1. Five months after the first disbursement |
| | | 2. Implement the specific liquid effluents management procedure. | 2. Evidence of implementation | 2. Periodically in the ESCRs |
| 3.5 | Hazardous Substances Management | 1. Prepare a specific procedure in the IMS to manage hazardous substances to be complied with by the main contractor and its subcontractors. | 1. Hazardous Substances Management Procedure. | 1. Five months after the first disbursement |
| | | 2. Implement the specific hazardous substances management procedure. | 2. Evidence of implementation | 2. Periodically in the ESCRs |
| 3.6 | Pesticides Use and Management | 1. Draft an IMS-specific procedure for pest control applicable to the Project operations and construction phases forbidding the purchase, storage and use of product included in classes Ia (extremely hazardous) or Ib (highly hazardous) as per the World health Organization (WHO) classification of pesticides based on how hazardous they are. | 1. Pest Control Procedure | 1. Five months after the first disbursement |
| | | 2. Implement the specific pest control procedure in the IMS. | 2. Evidence of implementation | 2. Periodically in the ESCRs |
| PS4: Community Health and Safety | | | | |
| 4.1 | Road Safety Plan | 1. Prepare, as part of the IMS, the Road Safety Plan applicable to the Project construction area and to be compulsorily complied with by both payroll and outsourced personnel, which considers: i) compulsory defensive driving | 1. Road Safety Plan | 1. Six months after the first disbursement |

| No. | Aspect | Action | Product | Delivery date |
|-----|--------|--|--------------------------------------|-------------------------------------|
| | | <p>courses for all truck or machinery drivers, whether owned or rented; ii) random alcohol and drug screening tests to truck and owned or rented machinery drivers; iii) identification of sensitive sites along the routes of trucks and owned or hired light vehicles personnel establishing specific driving guidelines in certain places; iv) good behavior standards when dealing with members of the community; and v) coordination activities with local authorities and road police (to implement detours and the increase in road safety at night or in the event of bad weather conditions).</p> | | |
| | | <p>2. Implement the Road Safety Plan.</p> | <p>2. Evidence of implementation</p> | <p>2. Periodically in the ESCRs</p> |