

**Project Terminal XXXIX - BRAZIL Environmental
and Social Action Plan (ESAP)**

No.	Area	Action	Product/Deliverable	Completion Date
ND 1: Assessment and management of environmental and social risks and impacts				
1.1	E&S Assessment and Management System	<ol style="list-style-type: none"> 1. Readjust the Integrated Management System to address the expansion works and the social issues, migrating to an integrated E&S Management System. 2. Setting up the Social Management Area. 	<ol style="list-style-type: none"> 1. Integrated ESMS including expansion works 2. Social Management Area implemented with an appointed person in charge 	<ol style="list-style-type: none"> 1. Six months after signing the contract 2. Six months after signing the contract
1.2	Policies	<ol style="list-style-type: none"> 1. Establish a comprehensive policy defining the E&S objectives and principles helping the Project achieve a sound E&S performance. 2. Disclose the new policy to all collaborators. 	<ol style="list-style-type: none"> 1. Adopted policy 2. Policy disclosed to collaborators 	<ol style="list-style-type: none"> 1. Six months after signing the contract 2. Nine months after signing the contract
1.3	Identification of Risks and Impacts	<ol style="list-style-type: none"> 1. Prepare an E&S risks and impacts assessment study for the operation and the expansion works (including climatic change impacts, potential alteration of biodiversity and aquatic and land habitat, water quality, hazardous waste management and handling of oil waste). 	<ol style="list-style-type: none"> 1. Completed integral assessment study 	<ol style="list-style-type: none"> 1. Six months after signing the contract
1.4	Management Programs	<ol style="list-style-type: none"> 1. Prepare management programs describing the mitigation measures and actions of the E&S risks and impacts identified during the operations and terminal expansion works with monitoring logs. 	<ol style="list-style-type: none"> 1. Air Emissions and Air Quality Management Program prepared; 2. Noise Levels Management Program prepared 3. Social Responsibility and Social Management Program prepared 4. Social Communication and Environmental Education Program prepared 5. Risk Management Program prepared 6. Hydric Resources Management Program prepared 	<ol style="list-style-type: none"> 1, 2, 3, 4, 5, 6: Six months after signing the contract
1.5	Organizational Capacity and Competency	<ol style="list-style-type: none"> 1. Appoint a person in charge of social issues able to manage the social impacts and risks as well as the relations with the stakeholders and their management through the implementation of a Social Management area. 	<ol style="list-style-type: none"> 1. Social Management Area implemented with an appointed person in charge with appropriate training and professional experience 	<ol style="list-style-type: none"> 1. Six months after signing the contract
1.6	Emergency Preparedness and Response	<ol style="list-style-type: none"> 1. Draft a procedure for an adverse climatic conditions scenario affecting port operations 	<ol style="list-style-type: none"> 1. Procedure prepared 	<ol style="list-style-type: none"> 1.. Before the first disbursement
1.7	Stakeholder Engagement	<ol style="list-style-type: none"> 1. Update the mapping of stakeholders considering the neighboring communities. 2. Update consultation process with the stakeholders with an updated mapping. 3. Advise the stakeholders on the expansion project as well as the construction works phase and their risks and impacts related to the neighboring community and other stakeholders. 	<ol style="list-style-type: none"> 1. Updated Stakeholders Mapping considering the neighboring communities 2. Updated Stakeholders Consultation Report 3. Evidence of communication on the Project, risks and impacts of expanding T39 	<ol style="list-style-type: none"> 1, 2 and 3: Nine months after signing the contract
1.8	External Communication and Grievance Mechanisms	<ol style="list-style-type: none"> 1. Establish an external grievances mechanism enabling filing claims anonymously. 2. Develop informative material on the E&S actions of T39 and the works. 	<ol style="list-style-type: none"> 1. Reviewed external grievances mechanism 2. Evidence of information on T39 provided to external stakeholders 	<ol style="list-style-type: none"> 1 and 2: Nine months after signing the contract
ND 2: Labor and Working Conditions				
2.1	Human Resources Policies and Procedures	<ol style="list-style-type: none"> 1. Issue a Human Resources Policy in accordance with PS 2 as well as national legislation in effect. 2. Disclose the new policy among the workers once it is issued. 	<ol style="list-style-type: none"> 1. Issued Human Resources Policy 2. Evidence of Policy disclosure 	<ol style="list-style-type: none"> 1. Before the first disbursement 2. Before the first disbursement
2.2	Labor and Working Conditions	<ol style="list-style-type: none"> 1. Review the procedure for onboarding new workers including: i) the need to apply it to third-party workers; ii) social management issues, such as ethics and conduct in 	<ol style="list-style-type: none"> 1. Updated and disclosed New Workers Onboarding Procedure 	<ol style="list-style-type: none"> 1. Before the first disbursement

No.	Area	Action	Product/Deliverable	Completion Date
		addition to health, safety and environment; and iii) effectiveness period and dates for refreshing for the whole workforce.		
2.3	Non-Discrimination and Equal Opportunity	<ol style="list-style-type: none"> 1. Draft a non-discrimination and equal opportunity procedure or training (also, mention this issue in the Human Resources Policy to be issued). 2. Draft a Code of Ethics for T39. 3. Meet the workers-with-disabilities quota set forth in the law. 	<ol style="list-style-type: none"> 1. Evidence of inclusion of this item in the Social Management and Human Resources Policy of T39 2. Reviewed Code of Ethics based on T39's model code disclosed 3. Number of workers with disabilities in compliance with the statutory quota 	1 to 3: Before the first disbursement
2.4	Retrenchment	<ol style="list-style-type: none"> 1. Review the document in order to insert the collective dismissal item. 	<ol style="list-style-type: none"> 1. Updated procedure including the collective dismissal item 	<ol style="list-style-type: none"> 1. One year after signing the contract
2.5	Grievance Mechanism	<ol style="list-style-type: none"> 1. Draft an internal grievance mechanism specific for T39 allowing individuals to file anonymous claims. 2. Disclose the mechanism to the workforce. 	<ol style="list-style-type: none"> 1. Adopted Grievance Mechanism 2. Evidence of the disclosure of the mechanism to the workforce. 	<ol style="list-style-type: none"> 1. Before the first disbursement 2. Before the first disbursement and subsequently on an ongoing basis in compliance reports (ESCR)
2.6	Child or Forced Labor	<ol style="list-style-type: none"> 1. Hire a minor apprentice to meet the statutory quota. 	<ol style="list-style-type: none"> 1. Evidence of the number of employees under minor apprentice contracts in compliance with the statutory quota. 	<ol style="list-style-type: none"> 1. Six months after signing the contract
2.7	Occupational Health and Safety	<ol style="list-style-type: none"> 1. Adjust or rebuild the indoor floors that are uneven or have holes to make them compliant with applicable standards. 2. Rebuild roads considering using concrete in order to eliminate uneven spots or holes in the ground. 	<ol style="list-style-type: none"> 1. Evidence of the adjustment and/or reconstruction works of the indoor floors 2. Evidence of reconstruction works considering the use of concrete 	<ol style="list-style-type: none"> 1. Six months after signing the contract 2. Six months after signing the contract
2.8	Supply Chain	<ol style="list-style-type: none"> 3. Develop and implement an Outsourced Companies Management Procedure including E&S aspects. 	<ol style="list-style-type: none"> 3. Drafted and developed Outsourced Companies Procedure. 	<ol style="list-style-type: none"> 1. Nine months after signing the contract
ND 3: Resource Efficiency and Pollution Prevention				
3.1	Resource Efficiency	<ol style="list-style-type: none"> 1. Draft an Energy Management Plan based on the general EHS guidelines of the World Bank Group. 	<ol style="list-style-type: none"> 1. Energy Management Plan 	<ol style="list-style-type: none"> 1. Twelve months after signing the contract
3.2	Greenhouse Gases	<ol style="list-style-type: none"> 1. Prepare an inventory of GHG under the calculation methodology in the ABNT NBR ISO 14.064-1 standard or the GHG Protocol. 2. Prepare annual GHG emission reports. 	<ol style="list-style-type: none"> 1. GHG inventory 2. Annual GHG emission reports 	<ol style="list-style-type: none"> 1. Nine months after signing the contract 2. Advise on an ongoing basis in compliance reports (ESCR)
3.3	Water Consumption	<ol style="list-style-type: none"> 1. Draft and implement a Water Conservation Program following the criteria established in the General EHS Guidelines of the World Bank Group. 	<ol style="list-style-type: none"> 1. Water Conservation Program 	<ol style="list-style-type: none"> 1. Twelve months after signing the contract
3.4	Pollution Prevention	<ol style="list-style-type: none"> 1. Update the air emissions assessment considering all the emission sources in the Project and the most recent Municipality Classification of the State of São Paulo. 2. Draft a report with the air dispersion assessment considering the future operations of the terminal analyzing the impact of its emissions under the present classification of the Project area of influence. 3. Perform a new assessment of sound pressure levels (acoustic baseline) at the terminal in accordance with the latest publication of the local standard (BNT NBR 10151:2019 – Vers. 2020). 	<ol style="list-style-type: none"> 1. Updated report with estimated air emissions 2. Air dispersion assessment report 3. New acoustic baseline established 	<ol style="list-style-type: none"> 1. Nine months after the disbursement 2. One year after signing the contract 3. Nine months after the first disbursement
3.5	Hazardous Materials Management	<ol style="list-style-type: none"> 1. Increase the containment pool capacity of the diesel oil tank so as to amount to at least 110% of the total volume of the tank. 	<ol style="list-style-type: none"> 1. Evidence of the increase of the containment pool capacity of the diesel oil tank 	<ol style="list-style-type: none"> 1. Before the first disbursement
ND 4: Community Health and Safety				

No.	Area	Action	Product/Deliverable	Completion Date
4.1	Emergency Preparedness and Response	<ol style="list-style-type: none"> 1. Update the EAP in order to identify and cover the affected communities, engaging them in the emergency preparedness and response activities. 2. Reveal the EAP to the community. 3. Invite the neighboring communities to participate in theoretical trainings and emergency drills. 4. Consider in the EAP specific scenarios related to the involvement of the seasonal workforce and the expansion works. 5. Include a specific emergency scenario and procedure in the EAP related to the abnormal emission of particulate matter in the operations covering the nearby communities, in addition to implementing awareness measures among the population through trainings and presenting its grievance mechanism channel. 	<ol style="list-style-type: none"> 1. Updated EAP with stakeholders 2. Evidence of meetings to engage the communities 3. Evidence of emergency theoretical trainings and drills 4. Updated EAP with emergency scenarios 5. Evidence of awareness training involving the community 	1, 2, 3, 4 and 5: Nine months after the first disbursement
4.2	Security Personnel	<ol style="list-style-type: none"> 1. Train the workers in the property security area of T39 on community health and safety, and human rights, and invite the security workers of SPA to participate. 	<ol style="list-style-type: none"> 1. Evidence of the training performed including a list of attendance of the security personnel 	1. Nine months after the first disbursement