

RIVERPAR – PARAGUAY
Environmental and Social Action Plan (ESAP)

No.	Aspect	Action	Deliverable	Delivery date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Environmental, Social, and Health and Safety Management System	1. Prepare an Environmental and Social Management System (RESMS) ¹ aligned with Atria's Environmental and Social Integrated Management System (ESMS).	1. Environmental and Social Management System.	1. Prior to first disbursement.
		2. Implement the RESMS.	2. Evidence of implementation.	2. Periodically as part of the Environmental and Social Compliance Report (ESCR).
1.2	Riverpar Environmental, Social, and Health and Safety Policy	1. Adopt a unique HSSE Policy that is aligned with Atria's HSSE Policy.	1. Riverpar HSSE Policy.	1. Prior to first disbursement.
		2. Implement the HSSE Policy.	2. Evidence of implementation.	2. As part of the ESCR.
1.3	Identification and assessment of Riverpar's environmental and social aspects and occupational hazards	1. Prepare HSE hazards and aspect identification and evaluation matrices exclusive to Riverpar's activities.	1. HSE risk and aspect identification and evaluation matrices.	1. Prior to first disbursement.
		2. Implement and keep updated the HSE hazards and aspect identification and evaluation matrices.	2. Evidence of implementation.	2. As part of the ESCR.
1.4	Biogas Plant	1. Prepare an environmental assessment study that proves that the biogas plant will not generate: i) significant impacts on natural or critical habitats; ii) significant impacts on indigenous or native lands; iii) significant impacts on areas of high heritage potential (archaeological, cultural, paleontological); and iv) significant involuntary displacement.	1. Environmental study for the biogas plant.	3. Prior to the construction of the biogas plant.
1.5	Environmental and social management measures	1. Implement the environmental and social management measures contained in the corresponding environmental and social studies.	1. Evidence of implementation.	1. As part of the ESCR.
		2. Evaluate the effectiveness of environmental and social management measures.	2. Effectiveness reports.	2. As part of the ESCR.
1.6	Gender Programs	1. Eliminate barriers that hinder the recruitment of female staff at Riverpar.	1. Copy of the Terms of Reference for Riverpar personnel recruitment.	1. As part of the ESCR.

¹ RESMS – Riverpar Environmental and Social Management System. The terms "Environmental and Social" include environmental, social, and health and safety aspects.

No.	Aspect	Action	Deliverable	Delivery date
1.7	Training Program	1. Prepare a specific Annual Training Program for personnel assigned to Riverpar, considering, among other aspects: i) the relevance of the risks and impacts identified in the HSE matrices; ii) the seriousness of accidents that may have occurred to assigned personnel; iii) changes in technology that have occurred or are programmed for the activities to be performed out; and iv) the hiring of new personnel.	1. Annual Training Plan.	1. 6 months after the first disbursement.
		2. Implement the Annual Training Program.	2. Evidence of implementation.	2. As part of the ESCR.
1.8	Accidents Management	1. Prepare a specific procedure for the management of personal and environmental accidents to the Company's activities.	1. Procedure for the management of personal and environmental accidents.	1. 2 months after the first disbursement.
		2. Implement the procedure for the management of personal and environmental accidents.	2. Evidence of implementation.	2. As part of the ESCR.
1.9	Emergency Management	1. Keep Riverpar's emergency prevention and response plans up to date, based on Atria's Emergency Plans Manual.	1. Updated emergency prevention and response plans.	1. As part of the ESCR.
		2. Conduct accident prevention activities (including drills) for Riverpar's land facilities and fleet units.	2. Evidence of preventive activities and drills.	2. As part of the ESCR.
1.10	Monitoring and review	1. Prepare an Annual Program to achieve HSSE Goals, establishing key performance indicators (KPIs).	1. Annual Program of HSSE Goals.	1. 6 months after the first disbursement.
		2. Implement the Annual HSSE Goal Program.	2. Evidence of implementation.	2. As part of the ESCR.
1.11	Stakeholder Identification and Engagement	1. Develop a Stakeholder Engagement Plan.	1. Stakeholder Engagement Plan.	1. Prior to first disbursement.
		2. Implement the Stakeholder Engagement Plan.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Regularly update the Stakeholder Engagement Plan, especially at the time of defining the biogas plant construction project.	3. Updated Stakeholder Identification and Engagement Plan.	3. Prior to the start of construction of the biogas plant.
1.12	Third-Party Grievance Mechanism	1. Prepare a document describing how the Third-Party Grievance Mechanism is expected to operate.	1. Description of the Third-Party Grievance Mechanism.	1. Prior to first disbursement.
		2. Adopt the Third-Party Grievance Mechanism.	2. Evidence of adoption.	2. As part of the ESCR.
PS 2: Labor and Working Conditions				

No.	Aspect	Action	Deliverable	Delivery date
2.1	Human Resources Policies	1. Develop a Human Resources Policy applicable to personnel assigned to Riverpar.	1. Human Resources Policy specific to Riverpar.	1. Prior to first disbursement.
		2. Implement the Human Resources Policy specific to Riverpar.	2. Evidence of implementation.	2. As part of the ESCR.
2.2	Retrenchment	1. Prepare a documented procedure to properly manage workforce reductions during the construction of the biogas plant.	1. Procedure to manage workforce reductions.	1. 6 months before the end of the Biogas Plant construction stage.
		2. Implement the retrenchment procedure.	2. Evidence of implementation.	2. As part of the ESCR.
2.3	Mechanism for attention and resolution of personnel complaints and grievances	1. Prepare a grievance mechanism to attend to and resolve complaints and grievances for Riverpar's contracted personnel, both for activities associated with river transportation and those related to the construction and operation of the biogas plant.	1. Grievance mechanism for attention and resolution of complaints and grievances.	1. Prior to first disbursement.
		2. Implement the Mechanism for attention and resolution of personnel complaints and grievances.	2. Evidence of implementation.	2. As part of the ESCR.
2.4	Provisions for People with Disabilities	1. Include the possibility of hiring personnel with some degree of disability in the Human Resources Policy.	1. Copy of the Human Resources Policy.	1. Prior to first disbursement.
2.5	Workers Engaged by Third Parties	1. Develop a specific procedure to manage personnel provided by external firms, to ensure that such personnel: i) comply with the labor, environmental, health, and safety requirements of the client; ii) have received adequate training in local legislation and applicable environmental requirements; iii) are evaluated on their performance based on their compliance with Riverpar's policies; and iv) have access to Riverpar's personnel complaints and grievance mechanism.	2. Specific procedure for the hiring of Riverpar personnel.	1. Prior to first disbursement.
		2. Implement the specific procedure to manage personnel assigned to Riverpar.	3. Evidence of implementation.	2. As part of the ESCR.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Resource Efficiency and Pollution Prevention	1. Ensure, through specific clauses in the contracts for the acquisition of goods or services, that suppliers guarantee: i) that no pollutants (to water, soil and air) are emitted in concentrations or at levels exceeding those permitted by Paraguayan legislation, or the limits indicated by international good practice; ii) the selection of financially viable technologies to reduce greenhouse gas (GHG) emissions and improve the resilience to climate change; iii) efficient processes in the consumption of energy, water, and	1. Copies of the contracts for the acquisition of goods and services.	1. 6 months after the first disbursement.

No.	Aspect	Action	Deliverable	Delivery date
		other resources and inputs; and iv) processes to avoid or reduce the generation of hazardous waste and waste material.		
		2. Implement the actions committed to in the contracts.	2. Evidence of implementation.	2. As part of the ESCR.
3.2	Greenhouse Gases	1. Analyze technically and financially feasible alternatives for the Project to reduce GHG emissions.	1. Analysis of alternatives.	1. 12 months after the first disbursement.
		2. Implement options to reduce GHG emissions.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Calculate Riverpar's GHG emissions for the year ending.	3. Calculation of GHG emissions.	3. As part of the ESCR.
		4. Estimate the emissions to be generated by Riverpar for the following year.	4. GHG emissions estimates.	4. As part of the ESCR.
3.3	Waste Management	1. Establish a documented waste management procedure for waste generated by Riverpar's activities.	1. Waste Management Procedure.	1. Prior to first disbursement.
		2. Implement the Waste Management Procedure.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Prepare procedures to manage the waste generated by the biogas plant.	3. Waste Management for the biogas plant.	3. Prior to start of works.
		4. Implement the Waste Management Procedures.	4. Evidence of implementation.	4. As part of the ESCR.
3.4	Resource Efficiency	1. As part of the RESMS and using efficiency indicators to monitor the optimization process, develop documented procedures to: i) rationalize the use of water and energy; and ii) promote recycling or reuse of waste.	1. Procedures to rationalize the use of water and energy.	1. 12 months after the first disbursement.
		2. Implement the program to optimize the use of water and energy.	2. Evidence of implementation.	2. As part of the ESCR.
3.5	Pollution Prevention	1. Incorporate the RESMS to prevent and mitigate pollution events during barge operations.	1. Proposed security measures.	1. Prior to first disbursement.
		2. Incorporate in the RESMS possible pollution scenarios applicable to the construction of the biogas plant.	2. Applicable pollution scenarios.	2. Prior to the start of construction of the Biogas Plant.
		3. Implement the emergency plans.	3. Evidence of implementation.	2. As part of the ESCR.
3.6	Hazardous Substances Management	1. Prepare a specific procedure for the management of hazardous substances that prohibits the purchase, storage, or handling of products containing	1. Hazardous Substances Management Procedure.	1. Prior to first disbursement.

No.	Aspect	Action	Deliverable	Delivery date
		hazardous substances included in classes "Ia" (extremely hazardous) or "Ib" (highly hazardous) according to the WHO hazard classification.		
		2. Implement the specific procedure for the management of hazardous substances.	2. Evidence of implementation.	1. As part of the ESCR.
PS 4: Community Health, Safety, and Security				
4.1	Community Health and Safety	1. Update the Project's risk and impact identification, control, and monitoring matrices to include those that could affect the health and safety of neighboring communities.	1. Risk identification matrices with the risks and impacts on the communities.	1. Prior to first disbursement.
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
6.1	Biodiversity Conservation	1. Conduct an analysis of natural and critical habitats to evaluate the possible impact on biodiversity during the construction of the biogas plant.	1. Expert reports.	1. As part of the ESCR.
		2. For any critical habitat that will be affected by the Biogas Plant: i) conduct an assessment that justifies, through an analysis of alternatives, why the site was chosen; ii) prepare a biodiversity management plan; and iii) generate an offset area that demonstrates that a net gain in biodiversity will be achieved upon its establishment.	2. Critical habitat management measures.	2. As part of the ESCR.
PS 8: Cultural Heritage				
8.1	Chance finds	1. Prepare a Chance Finds Procedure.	1. Chance Finds Procedure.	1. Prior to first disbursement.