

Environmental and Social Review Summary (ESRS)

Riverpar: Green Pushboat Financing for the Paraná–Paraguay Waterway 13499-01 - PARAGUAY

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1. General Information of the Project and Scope of IDB Invest's Environmental and Social Review

Riverpar (the “Company”), a member of the Atria Group¹ (hereinafter “Atria”), is primarily dedicated to providing river freight services in the Paraná-Paraguay Waterway (the “Waterway”)². Riverpar’s activities are conducted within Atria’s facilities or through third-party arrangements, with personnel provided by Atria through management contracts.³

Riverpar operates under different modalities, depending on the contractual arrangements in place. These include: i) shipowner⁴ of tank barges,⁵ ii) commercial leasing,⁶ iii) freight participation, where specific companies (such as UABL Paraguay, UABL Argentina, Lonehort S.A., etc.) provide pushboats for the convoys while Riverpar supplies the barges; iv) “bareboat” leasing, where the Company leases the pushboat to a third party without any associated services (for example, a crew); and v) river transportation services.⁷ Riverpar subcontracts its barge service (including registration with the Directorate of the National Merchant Marine (Dirección Marina Mercante Nacional), cargo and discharge control, crew transfer and travel support, etc.) to the companies Yataity S.A. (in Paraguay) or Agenpar S.A. (in Argentina). In 2022, Riverpar mobilized a total of 414,088 tons of goods,⁸ entering into contracts with companies within Atria and third parties.⁹

¹ Atria Soluciones Logísticas (“Atria Logistics Solutions”): www.atrialogistica.com.

² With an extension of 3,442 km, the Waterway is one of the largest navigable systems in the world, spanning the territories of Argentina, Bolivia, Brazil, Paraguay, and Uruguay. The Waterway serves as a conduit for the transportation of a variety of goods (soybeans, corn, wheat, malting barley, sorghum, sunflower, peanuts) and their derivatives (flours, pallets, and oils) produced in the region, as well as manufactured products, iron ore and liquid cargoes (fuel, Ethanol).

³ Riverpar owns 26 operational Paraguayan-flagged barges (along with 3 non-operational barges), which are leased under freight participation contracts.

⁴ The term “shipowner” refers to an individual who, regardless of ownership, operates the ship or vessel for navigation in their own name and under their own responsibility.

⁵ Barges UT 4001, River 810, River 811, River 822B and River 823B, all owned by UABL Paraguay S.A.

⁶ Such as the agreement with Parfina (an Atria company), which allows it to operate 24 Bolivian-flagged barges owned by Touax Hidrovía Corp.

⁷ Agreements with companies like Trafigura, Copetrol, and Petrosur, which allow it to provide fuel transportation services between specific mooring points in Argentina and the OTS terminal (an Atria company located in the city of Presidente Franco) in Paraguay.

⁸ Agricultural products (vegetable oil, fertilizers, grains, etc.), fuels (diesel, gasoline, Jet A1, pet-coke, etc.), construction materials (cement, clinker, gypsum, rails, etc.), forestry products, mineral products, and general cargo (automobiles, steel coils, etc.).

⁹ Among the companies with which Riverpar enters into freight contracts, the following can be mentioned: CCI, Copetrol, Fuelpar, Mercurio Group S.A., Monte Alegre S.A., Novum, Panchita, Petrobras, Petroil, Petropar, Petrosur, Solor S.A., Terminales y Logística Portuaria S.A., Trafigura and Vitól.

This transaction (the “Project”) consists of financial assistance for Riverpar to: i) build and operate a biogas-powered pushboat; and ii) in a second stage, to build a biogas plant, whose location and technology have not yet been determined.

The environmental and social due diligence (“ESDD”) process included, among other activities, the following: i) the documentary review of environmental and social information, specifically, of its Environmental and Social Management System¹⁰; ii) an assessment of the environmental and social impacts and risks associated with the sites where Riverpar operates and the types of activities it conducts; iii) an assessment of the Company’s organizational structure; and iv) an analysis of Riverpar’s workforce recruitment and management modalities. The impacts and risks associated with the construction and operation of the biogas plant will be identified and assessed once its location has been established, and the corresponding environmental and social studies have been conducted.

2. Environmental and Social Categorization and Rationale

The Project has been classified as a Category B operation according with IDB Invest’s Environmental and Social Sustainability Policy¹¹, since its activities will likely generate environmental, social impacts and occupational risks of medium to high intensity. These are reversible and can be managed through the implementation of established management plans and programs within the industry.

The Performance Standards (PS) triggered by the Project are: i) PS1: Assessment and Management of Environmental and Social Risks and Impacts; ii) PS2: Labor and Working Conditions; iii) PS3: Resource Efficiency and Pollution Prevention; iv) PS4: Community Health, Safety, and Security; and v) PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources.

3. Environmental and Social Context

3.1 General Characteristics of the Project’s sites

The Project’s operations will be conducted in the Waterway, where a navigational system has been established to ensure the continuous circulation of high-capacity vessels, which primarily transport minerals, fuels, and agricultural products. The Waterway was conceived during the 1990s as part of the Mercosur Agreement.¹² It traverses floodplains, wetlands, and highly productive and diverse ecosystems that naturally purify water, regulate climate, mitigate the effects of extreme floods and global warming, fertilize the soil, and host a wide range of plant and animal species.

¹⁰ In April 2024, the Quality, Environmental, and OH&S management systems of OTS S.A., a part of the Atria Group, were certified under ISO 9001, ISO 14001, and ISO 45001 Norms, respectively. The management system’s general policies, programs, plans, and procedures are corporate in nature and apply to all Atria activities, with specific procedures currently in place for OTS S.A.’s operations (Presidente Franco, Puerto Tres Fronteras, Paraguay).

¹¹ https://idbinvest.org/sites/default/files/2020-05/idb_invest_politica_de_sostenibilidad_2020_SP.pdf

¹² Mercosur, also known as the Southern Common Market, is an economic and commercial integration mechanism established by the Treaty of Asunción in 1991 (by Argentina, Brazil, Paraguay, and Uruguay), modified and updated in 1994 by the Ouro Preto Protocol.

The Project sites extend throughout the entire Waterway and are connected to ports, berths, and administrative facilities owned by Atria¹³ and other commercial entities.

3.2 Contextual Risks

An independent analysis¹⁴ has revealed that the potential environmental and social impacts (synergistic and cumulative) resulting from navigation activities, the development and operation of port infrastructure, and river dredging operations in the Paraná River have not been adequately assessed or monitored regarding their effects on the Waterway ecosystem.

While dredging and beaconing activities are currently implemented to ensure safe navigation conditions, there have been reports of unusual drops in river water levels impacting river transportation (such as the one that occurred in 2020).

The implementation of Argentina's toll collection system in 2023 for vessels navigating the Waterway between the Santa Fe (Argentina) – Confluencia (Paraguay) section¹⁵ has led to a diplomatic dispute that remains unresolved. This conflict poses a contextual risk to the development of the Project and must be taken into account.

Another contextual risk refers to the exploitation of the Waterway by organized crime, particularly for drug trafficking purposes. Reports¹⁶ indicate incidents of drug seizures concealed within cargo transported via the Waterway, primarily destined for European ports. This risk necessitates consideration in the development of the Project.

4. Environmental Risks and Impacts and Proposed Mitigation and Compensation Measures

4.1 Assessment and Management of Environmental and Social Risks and Impacts

4.1.a Environmental and Social Management System

The Client maintains an integrated environmental, health, safety, and product quality Management System (“ESIMS”), certified to ISO standards, established at a corporate level, and implemented across all the group's companies. The ESIMS is overseen by a professional who reports to Atria's Human Resources and Health, Safety, and Environment (“HSE”) Management. The management of HSE aspects, both inland and along the riverside, is the responsibility of a single HSE coordinator, along with four technicians in Paraguay and three technicians in Argentina, all of whom report to the ESIMS leader.

¹³ Among these facilities (all located in Paraguay) the following can be cited: Edificio Rosa T, Amarradero Chacoí, Terminal Tres Fronteras and Terminal Dos Fronteras.

¹⁴ “Una mirada sobre los impactos de la Hidrovía en los Humedales del Corredor Fluvial Paraguay – Paraná (“A look at the impacts of the Waterway on the Wetlands of the Paraguay – Paraná River Corridor) – Wetlands International – 2019.”

¹⁵ The toll collection system was established by Resolution 625/2022, issued by the Ministry of Transportation of Argentina.

¹⁶ United Nations Office on Drugs and Crime. Global Report on Cocaine 2023. March 2023.

Riverpar will develop and implement an Environmental and Social Management System (“RESMS”)¹⁷ in alignment with Atria’s ESIMS. The management of RESMS documentation will be endorsed by Atria through a specific procedure within its ESIMS. Consequently, Atria will be responsible for monitoring the preparation, review, approval, storage, and dissemination of RESMS plans, programs, and procedures, as well as the records generated during their implementation. The RESMS will be overseen by a professional who will report to the leader of Atria’s ESIMS.

4.1.b Policy

Atria maintains a Safety, Health, Environment and Quality Policy that is applicable to all its companies. Riverpar will develop and implement a similar policy aligned with Atria’s HSE policy.

4.1.c Identification of Risks and Impacts

Atria employs specific procedures and matrices to identify and assess the potential environmental and social impacts of its operations. Riverpar will develop similar matrices, incorporating criteria to ensure compliance with current legislation and relevant environmental and social requirements for the Project¹⁸.

4.1.c.i Direct and Indirect Impacts and Risks

In broad terms, the impacts and risks associated with the Project’s construction phase are linked to: i) the generation of noise, vibrations, dust, and polluting effluents; ii) the potential effects on soil quality, flora, and fauna, and iii) disruptions to vehicle and truck traffic. The primary impacts and risks associated with the supply, operation, and maintenance of vessels and barges encompass: i) potential air, water, and soil pollution; ii) the generation of noise; iii) potential soil and water pollution resulting from accidental pollutant spills; iv) vessel collision risks; v) risks of personal accidents; and vi) risks of explosions and fires.

4.1.c.ii Analysis of Alternatives

The construction of the pushboat is contingent upon the availability of shipyards suited for this purpose. With regard to the biogas plant construction, its location will be determined following an analysis of alternatives that will consider technical aspects alongside environmental, social, and health and occupational safety considerations.

4.1.c.iii Cumulative Impacts

The cumulative impacts of past, present, and future projects on pushboat construction are not material. The construction project for the biogas plant will undergo a study of its cumulative impacts.

¹⁷ RESMS – Riverpar Environmental and Social Management System. The term “Environmental and Social” also includes occupational health and safety aspects.

¹⁸ These include the legal provisions required in Argentina and Paraguay, as well as the requirements stipulated in the contracts that Riverpar enters into with any financial entity.

4.1.c.iv Gender Risks

In Latin America and the Caribbean, there is a significant gender gap, defined as differential and unequal access to economic, political, educational, and occupational opportunities based on sex or gender. This gap is reinforced by pervasive cultural norms dictating gender roles and exacerbated by weak legal protections or insufficient social responses. The gender gap leads to gender discrimination, unequal access to public services, educational disparities, wage, and employment gaps, and lagging rates of political participation. Paraguay's Gender Gap Index in 2023 is on par with five other countries in the region, with a score of 0.7, placing it higher than only one out of the 26 regional countries.¹⁹

Gender-based violence and harassment ("GBVH") are significant issues in Latin America and the Caribbean, with the region itself having the highest global rate. In 2022, there were 36 reported cases of femicide in Paraguay.²⁰ The COVID-19 pandemic has further exacerbated gender-based violence. And while Paraguay has made recent strides in legal frameworks and government initiatives, challenges persist, as evidenced by the latest report from the United Nations Committee on the Elimination of Discrimination against Women.²¹

Atria's Non-Discrimination and Workplace Harassment Policy ("PL-06") advocates specific measures to ensure equal opportunities, respect for diversity and individuality, and the prevention and eradication of all forms of discriminatory or harassing conduct in the workplace. Moreover, its Code of Ethics (section 9) establishes, among others, the following commitments: i) ensuring equal opportunities regardless of race, color, religion, nationality, age, gender, marital status, or any other quality of the employee that is protected under applicable law; ii) maintaining, based on mutual respect, a safe and non-discriminatory professional work environment; iii) prohibiting sexual harassment of any kind, including inappropriate or unwanted sexual behavior, whether physical or verbal, regardless of whether the harasser or victim is a company member, customer, guest or supplier.

4.1.c.v Gender Programs

To date, the staff allocated by UABL Paraguay to Riverpar does not include women. Although Riverpar does not have its own facilities, UABL S.A. and UABL PARAGUAY S.A. do provide gender-specific sanitary facilities, as well as dedicated facilities for women.

In the event of future recruitment processes for Riverpar, UABL Paraguay will include the possibility of recruiting female staff for the construction and operation of the planned biogas plant, with Riverpar ensuring the availability of gender-specific sanitary facilities.

¹⁹ <https://www.statista.com/statistics/803494/latin-america-gender-gap-index-country/>

²⁰ <https://es.statista.com/estadisticas/1290935/numero-de-femicidios-en-america-latina/>

²¹ CEDAW PARAGUAY.

4.1.c.vi Climate Change Exposure

The Waterway is situated in regions susceptible to moderate to high-intensity droughts, with a moderate growth trend (particularly in Brazil, Bolivia, and Paraguay).

The Project's location is exposed to physical risks linked to expected climate change phenomena. These risks include an increase in drought events and heatwaves, resulting in heightened water scarcity. Such conditions could potentially cause a decline in water levels within the Waterway, impacting navigation conditions.

4.1.d Management Programs

Atria has developed the following operating procedures to manage the HSE risks from vessel operations: i) PA-01 Waste Management; ii) PS-01 Rigging; iii) PS-02 Control of Rigging Elements; iv) PS-03 Work at heights; v) PS-04 Electrical Hazardous Work; vi) PS-05 Work in Confined Spaces; vii) PS-06 Personal Protective Equipment; viii) PS-07 Chemical Products, and ix) PS-08 Use of Tools and Equipment.

In adherence to Atria's ESMS, Riverpar will ensure that all relevant environmental and social aspects and any identified occupational hazards are managed through documented procedures.

4.1.e Organizational Capacity and Competency

Atria develops an annual training program encompassing a variety of HSE topics relevant to operations conducted in: i) pushboats; ii) berths; iii) offices; and iv) ports. Each training module within the learning program includes a description of its general content and the intended audience. The frequency of training events is contingent upon the Company's prioritization, in alignment with its needs.

Riverpar will develop an annual training program tailored to the activities of the Project's staff, taking into account factors such as: i) the relevance of the impacts and risks identified in their HSE matrices; ii) the severity of accidents that have occurred, as documented in the respective investigation reports; iii) technological changes that have occurred or are planned; and iv) the hiring of new staff.

4.1.f Emergency Preparedness and Response

Atria has prepared an Emergency Plans Manual, which establishes, among other aspects: i) the institutional arrangements for carrying out emergency preparedness and response activities on vessels of the Paraguayan and Argentine fleets (establishment of an Emergency Review and Response Committee); ii) emergency report formats; iii) the checklists for conducting training exercises; and iv) the indications for carrying out response actions in the event of different types of emergencies (fire, collision, abandonment of ship, man overboard, medical emergency, failure of the ship's main engine and steering system, confined space rescue, barge release, severe weather, stranding and grounding, etc.). The emergency prevention and response actions for hydrocarbon

spills on vessels comply with PLANACON.²² Furthermore, Atria has developed an Emergency Plan for its administrative facilities located in both Argentina and Paraguay.

Atria maintains a specific procedure for the management of personal (both in-house staff and contractors) and environmental incidents and accidents, including the recording, investigation, and implementation of corrective and preventive actions. In this regard, Riverpar will undertake the following measures for the Project: i) keep its emergency prevention and response plans updated; ii) conduct preventive activities for its land facilities and fleet units (including drills); and iii) develop its own procedure for managing personal and environmental accidents based on Atria's procedure methodology.

4.1.g Monitoring and review

In terms of HSE management, Atria has established both strategic and specific objectives for 2024, which are continuously monitored. Key Performance Indicators (KPIs) have been developed for the HSE area and are reported on a monthly basis. These KPIs are subject to monitoring and measurement, and corrective actions are taken if they stray from the established goals. The KPIs are linked to the number of navigation, injury, and environmental incidents. In accordance with Atria's guiding principles, Riverpar will develop and implement an activities program to meet its own HSE objectives for the Project, establishing appropriate KPIs for this purpose.

4.1.h Stakeholder Engagement

Atria's ESMS currently includes a reporting channel for anonymous or named complaints (RESGUARDA) available to anyone who needs it. This reporting channel is accessible to employees, suppliers, and community members. However, the system lacks procedures for identifying stakeholders and informing and involving social actors systematically. Nonetheless, for each specific area of its operations, Riverpar will: i) produce a map of stakeholders; ii) develop and implement a Stakeholder Engagement Plan; iii) develop and implement mechanisms to disseminate the Company's environmental and social information; and iv) implement a system to capture and process complaints and grievances from stakeholders potentially affected by its activities.

4.1.h.i Disclosure of Information

Through the implementation of the Stakeholder Identification and Engagement Plan, Riverpar will ensure that the Company's environmental and social information is disclosed to the community on an ongoing basis. More specifically, during the Environmental Impact Assessment process for the biogas plant, Riverpar will establish mechanisms to potentially affected communities to understand the purpose, duration, and potential risks associated with this Project component. Additionally, it will disclose the public participation methods that will be employed throughout the facilities' operational lifespan.

²² The National Contingency Plan ("PLANACON") refers to the one prepared by Argentina (May 1995), as a signatory of the International Convention on Oil Pollution Preparedness, Response and Cooperation of the IMO (International Maritime Organization).

4.1.h.ii Informed Consultation and Participation

As part of its Stakeholder Identification and Engagement Plan, Riverpar will conduct ongoing stakeholder consultations. Particularly, the environmental licensing process for the biogas plant is subject to local legislation, which mandates a consultation process and a Public Hearing. The purpose of this process is to enable stakeholders to familiarize themselves with the Project, its potential impacts, how they will be managed, and a comprehensive overview of the mechanism for capturing and addressing community complaints and grievances.

4.1.h.iii Indigenous Peoples

The Project will not have a material impact on the indigenous population.

4.1.h.iv Private Sector Responsibilities Under Government-Led Stakeholder Engagement

The Project will be the sole entity responsible for stakeholder engagement.

4.1.i External Communication and Grievance Mechanisms

Atria manages external communications concerning complaints or grievances from third parties via the “Resguarda” platform, which utilizes printed posters and electronic communication channels (such as e-mail addresses and phone numbers) to capture any type of complaint. However, there is currently no documented procedure in place for handling complaints and grievances, outlining responsibilities, the resolution methodology, closure procedures, and the communication and documentation of the analysis results.

In this context, as part of the Stakeholder Identification and Engagement Plan, Riverpar will develop and implement a documented procedure for managing complaints and grievances from third parties. This procedure will establish, among other aspects, processes for capturing and documenting complaints, employee responsibilities for their management, the resolution methodology, and the communication protocol for reporting analysis results.

4.1.i.i Provisions for addressing vulnerable groups’ grievances

Riverpar’s operations are not expected to impact vulnerable communities.

4.1.i.ii Reporting to Affected Communities

Riverpar will maintain a constant flow of information to the affected communities through the implementation of its Stakeholders Identification and Engagement Plan.

4.2 Labor and Working Conditions

4.2.a Human Resources Policies and Procedures

Atria's human resources, health, and workplace safety management principles are summarized in the following policies: Non-Discrimination and Workplace Harassment Policy; Alcohol and Drug Policy; Tobacco Use Policy; Cell Phone and Audio Device Use Policy; Safety, Health, Environment, and Quality Policy; and Workplace Hygiene Policy.

While Riverpar will adhere to Atria's principles, it will also develop and implement a specific Human Resources Policy for the Project that complies with the applicable legal requirements and the environmental and social standards set by the Project's funding entities.

4.2.b Working Conditions and Management of Worker Relationships

Atria has a total of 465 employees, of which only 6% are women. For Riverpar's operation, UABL recruits and assigns crew members to operate the pushboats that move the barges. The supply of personnel complies with the industry-specific legal requirements.²³

Through its Human Resources Policy, Riverpar will, at the very least, commit to: i) inform workers about their rights, wages, overtime, compensation, and benefits; ii) uphold relevant collective bargaining agreements; iii) reject all types of discrimination, child labor and forced labor; iv) ensure equal opportunities in recruitment and retention processes (not making employment decisions based on personal characteristics such as gender, race, nationality, ethnicity, religion or beliefs, disability, age, or sexual orientation); v) provide workers with healthy and safe working conditions; and vi) promote worker health.

4.2.b.i Working Conditions and Terms of Employment

Riverpar does not contract employees directly,²⁴ but instead utilizes the services of UABL Paraguay S.A. under a service provision contract. The working conditions and terms of employment for personnel employed for Riverpar will be in full alignment with its Human Resources Policy.

4.2.b.ii Workers' Organizations

In accordance with Paraguayan law, 28 Atria employees in Paraguay are members of the Workers' Union of the Company Works, Terminals, and Services – OTS (SITEOTES). Riverpar will ensure that its hired personnel are afforded the same freedom of union affiliation.

²³ Law No. 476 of Paraguay. Código de Navegación Fluvial y Marítimo ("River and Maritime Navigation Code"). Enacted on 10/29/1957.

²⁴ Riverpar does not have employees of its own, and thus it is not listed as an employer in the Ministry of Labor, Employment and Social Security of Paraguay, nor in the Social Security Institute of Paraguay.

4.2.b.iii Non-discrimination and Equal Opportunity

In line with Atria's Non-Discrimination and Workplace Harassment Policy, Riverpar will commit to: i) foster an equitable work environment; ii) reject any form of harassment in the workplace or sexual harassment; iii) prohibit any form of discrimination; iv) promote respect for diversity and equal opportunities; v) condemn all forms of physical and psychological violence; vi) promote workplace equality regardless of gender, social status, political affiliation, race, or creed; and vii) respect freedom of expression and inclusive and respectful coexistence.

4.2.b.iv Retrenchment

Although significant workforce reductions are not anticipated to occur in the future, Atria currently does not currently have a documented procedure with mitigating actions to address such events.²⁵ However, Riverpar will prepare a documented procedure to properly manage workforce reductions during the construction of the biogas plant.

4.2.b.v Mechanism for Handling Staff Complaints and Grievances

Atria's employees and hired personnel can raise complaints through the "Resguarda" digital platform, which accepts submissions via phone calls and emails sent to designated addresses.

Riverpar will develop and implement a documented procedure for addressing and resolving any complaints or grievances that may arise during its river transportation operations and activities related to the construction and operation of the biogas plant. This procedure will apply to personnel provided by UABL Paraguay or any other Atria company, and it will ensure that any complaints or grievances from personnel (even if submitted anonymously) are adequately captured and accordingly processed, and that no employee faces retaliation for utilizing this system.

4.2.c Protecting the Workforce

All Atria employees benefit from the provisions afforded by Paraguayan and Argentine legislation. In Paraguay, all Atria personnel receive medical coverage through the Social Security Institute (IPS), which includes coverage for illness, work-related accidents, and occupational diseases. Moreover, workers covered by the IPS who meet the age and seniority requirements may opt to receive a monthly retirement benefit (or pension if the retirement was caused by incapacity for work).

Moreover, 212 Atria employees in Paraguay have private medical insurance²⁶, while all are covered by the IPS.

²⁵ Such as collective layoffs, which involve drastic reductions in staff for economic, technical, or organizational reasons, or other reasons unrelated to employee performance.

²⁶ Migone and San Lucas medical insurances.

Riverpar will comply with the legal requirements regarding medical coverage for its personnel and will also ensure that all employees engaged in its activities have adequate medical coverage, including coverage for illness, personal accidents, and occupational diseases.

4.2.c.i Child Labor - Forced Labor

Although Atria's Policies do not explicitly address child and forced labor, the Company rejects all forms of such practices. In this regard, Riverpar will include an explicit reference to the rejection of child and forced labor as a key tenet of its Human Resources Policy.

4.2.d Occupational Health and Safety

Atria implements its occupational health and safety management policies through a system of continuous improvement, utilizing documented plans, programs, and procedures. The Occupational Health and Safety Committee ("OH&S Committee") includes representatives from Atria (the General Manager and representatives from human resources, legal affairs, operations, maintenance, ports, shipyards, and IT management) as well as worker representatives. The committee meets monthly²⁷ to address relevant occupational health and safety issues.

Riverpar's operational scope includes activities on vessels and barges, as well as ports, port terminals, berths, and administrative buildings. The construction and operation of the biogas plant will be part of the inland activities.

Riverpar is committed to managing all identified occupational hazards through the RESMS (program, plan, procedure, or instruction), in compliance with all relevant HSE requirements in the ports, terminals, and berths where it operates. Priority is given to fire and explosion risk management in grain and fuel storage terminals.²⁸

4.2.e Provisions for People with Disabilities

Currently, Atria does not have facilities for people with disabilities. In accordance with its Human Resources Policy, Riverpar will remove any barriers to the employment of individuals with any form of disability.

4.2.f Workers Engaged by Third Parties

Riverpar will include requirements consistent with its HSE policies in the contracts it enters into for the provision of services. It will also develop a specific procedure to ensure that personnel recruited by third parties: i) preferably come from companies that have an adequate HSE system in place to comply with current legislation and applicable environmental and social requirements; ii) receive adequate training in the knowledge of applicable legislation and environmental and social

²⁷ HSE monthly meeting.

²⁸ The OTS terminal in Tres Fronteras, Paraguay, has grain storage silos (a 27,000 ton silo) and fuel storage tanks (8 tanks of 33,000 cubic meters for fuel storage and 6 bays for truck refueling).

requirements; iii) are evaluated on their performance based on their compliance with Riverpar's policies; and iv) have access to the Company's complaints and grievance mechanism.

4.3 Resource Efficiency and Pollution Prevention

Riverpar will promote resource efficiency and pollution prevention in the Project. In particular, it will ensure that the design, equipment, and operation of the pushboat and barges are adequate, and that the construction, equipment, and operation of the biogas plant meet the highest international standards.

Through specific clauses in the procurement contracts for these components, Riverpar will require suppliers to guarantee that: i) no pollutants (to water, soil and air) are emitted in concentrations or at levels exceeding those permitted by Paraguayan legislation, or the limits specified in the applicable World Bank guidelines;²⁹ ii) financially viable technologies are selected to reduce greenhouse gas (GHG) emissions and improve the resilience of the sites to climate change; iii) energy, water, and other resources and inputs are used efficiently; and iv) hazardous waste and waste materials are minimized or avoided.

4.3.a Resource Efficiency

To optimize energy management and resource use during the construction and operation phases, Riverpar will develop documented procedures to determine the means of efficient resource use, promote recycling or reuse of waste, and establish efficiency indicators to enable their optimization.

4.3.a.i Greenhouse Gases

While Atria's management has not yet established Key Performance Indicator values for greenhouse gas (GHG) emission reduction, in December 2022, the Company commissioned a Greenhouse Gas Emissions and Carbon Footprint Report for its pushboat operations³⁰.

For the Project, Riverpar will: i) consider alternative solutions and implement technically and financially viable programs that are cost-effective in reducing GHG emissions; and ii) at the end of each calendar year, calculate the GHG emissions corresponding to the previous year and estimate those that would be generated for the following year.

²⁹ The maximum limits for emissions to air, water, and soil are indicated in the "General Environmental, Health and Safety Guidelines (IFC – WBG – April 2012", applicable IFC-WBG operational guidelines, applicable WHO Guidelines, etc.). For the same pollutant emission quality indicator parameter for which national legislation and World Bank guidelines indicate different values, the most stringent value must be adopted.

³⁰ Atria Logística – Informe de Emisiones de Gases de Efecto invernadero y Huella de Carbono de las operaciones de remolcadores ("Greenhouse Gas Emissions and Carbon Footprint of Pushboat Operations Report") – Consultora ambiente y territorio S.A. – December 2022.

4.3.b Pollution Prevention

Atria has developed safety management manuals that include procedures to ensure the operational safety of the vessels, the occupational safety of personnel involved in their operation, and the prevention and mitigation of potential pollution events³¹.

To prevent environmental pollution, Riverpar will: i) incorporate Atria's RESMS safety manuals, which have been developed to prevent and mitigate pollution events during barge operations, into its own safety manuals; and ii) include in its emergency plans responses to the most likely contingency scenarios during the construction of the biogas plant.

4.3.b.i Waste

Atria complies with applicable legal requirements for managing hazardous waste (including hydrocarbons, vessel, and land facility maintenance waste, etc.).

For the Project and for the construction (of the biogas plant) and operation phases, Riverpar will develop documented waste management procedures that define the methodology for handling, temporary storage, removal and treatment or final disposal of waste.

4.3.b.ii Hazardous Substances Management

Atria has developed a documented procedure for the management of hazardous chemicals applicable to activities at land facilities and on vessels and barges.

For the Project, Riverpar will develop a specific procedure for the management of hazardous substances during both the construction and operation phases of its components. This procedure will explicitly state that Riverpar will not purchase, store, or handle products containing hazardous substances classified as "1a" (extremely hazardous) or "1b" (highly hazardous) according to the hazard classification of the World Health Organization (WHO). In the event that any of these substances are being used, Riverpar will plan their replacement with alternatives that do not belong to the aforementioned groups.

4.4 Community Health, Safety and Security

4.4.a Community Health and Safety

Riverpar will ensure that the impact and risk identification matrices applied to the planning, implementation, and monitoring phases of Project activities include those that could affect the health and safety of members of neighboring communities. When necessary, Riverpar personnel

³¹ The Vessel Operational Safety System developed by Atria complies with the International Management Code for the Safe Operation of Ships and for Pollution Prevention (ISM Code) adopted by the IMO (International Maritime Organization).

will conduct outreach and training activities for these communities on these issues, focusing on the analysis of their emergency prevention and response plans.

4.4.b Security Management

The security personnel assigned by Atria to guard vessels and barges (including Riverpar's barges): i) do not carry weapons; ii) are authorized by the Paraguayan National Police to perform this task; iii) are trained in aspects of the ISPS Code;³² and iv) hold an accreditation issued by the General Naval Prefecture ("PGN") of Paraguay. Riverpar will verify that the personnel assigned to facility security meet these requirements for all Project activities.³³

4.5 Land Acquisition and Involuntary Resettlement

Project activities are not expected to cause involuntary resettlement.

4.6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The Project is not expected to have a material impact on biodiversity. However, for any component of the biogas plant project that may have an impact, Riverpar will conduct a process to identify and assess critical or natural habitats.

4.7 Indigenous Peoples

Project activities are not expected to cause impacts on indigenous populations.

4.8 Cultural Heritage

4.8.a Protection of Cultural Heritage in Project Design

The Project is not expected to have adverse impacts on national heritage. However, Riverpar will implement an incidental findings procedure if necessary.

5. Local Access of Project Documentation

Information relating to the project can be requested by contacting Carolina Sosa via email at: cnsosa@atrialogistica.com.

³² ISPS: International Ship and Port Facility Security Code (IMO - (International Maritime Organization – July 2004).

³³ In accordance with the United Nations Code of Conduct for Law Enforcement Officials and the United Nations' Basic Principles on the Use of Force and Firearms by "Law Enforcement Officials".