

**PROLIFICO PROJECT - BRAZIL**  
**Environmental and Social Action Plan (ESAP)**

No.	Aspect	Action	Deliverable	Delivery Date
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>				
1.1	Environmental and Social Management System	1. Develop an Environmental and Social Management System (ESMS).	1. ESMS Manual.	1. Nine months after financial closure.
		2. Implement the ESMS at Jardins Unit.	2. Evidence of implementation of the ESMS at Jardins Unit.	2. One year and three months after financial closure and, next, as part of the Environmental and Social Compliance Report (ESCR).
		3. Implement the ESMS at Brooklin Unit.	3. Evidence of implementation of the ESMS at Brooklin Unit.	3. Six months after the start of operations of Brooklin Unit, and, next, as part of the ESCR.
1.2	Policy	1. Develop the Sustainability Policy of YUNA/Prolifico Group.	1. Sustainability Policy of YUNA/Prolifico Group.	1. Prior to financial closure.
		2. Approve the Sustainability Policy of YUNA/Prolifico Group.	2. Approval of the Sustainability Policy.	2. Prior to financial closure.
		3. Disseminate the Sustainability Policy with employees, contractors, suppliers, and the external public.	3. Evidence of dissemination.	3. Three months after financial closure.
1.3	Identification of Risks and Impacts	1. Develop a Risk and Impact Matrix for the Jardins Unit.	1. Risk and Impact Matrix for the Jardins Unit.	1. One month after financial closure.
		2. Develop a Risk and Impact Matrix for the Brooklin Unit.	2. Risk and Impact Matrix for the Brooklin Unit	2. One month after the start of operations at the Brooklin Unit.
1.4	Gender Risks	1. Develop and promote an Employee Health and Welfare Program, where awareness-raising activities will be carried out on domestic violence, mental health, among others.	1. Employee Health and Welfare Program.	1. Three months after the first disbursement.
		2. Implement the Employee Health and Welfare Program.	2. Evidence of implementation.	2. Seven months after first disbursement, and, next, as part of the ESCR.
1.5	Emergency Preparedness and Response	1. Develop an Emergency Preparedness and Response Master Plan.	1. Emergency Preparedness and Response Master Plan.	1. Three months after financial closure.
		2. Implement the Emergency Preparedness and Response Master Plan at the Jardins and Brooklin Units.	2. Evidence of implementation.	2. As part of the ESCR.
1.6	Monitoring and Review	1. Develop an ESMS Monitoring and Performance Plan that sets KPIs.	1. ESMS Monitoring and Performance Plan.	1. Three months after the first disbursement.
		2. Implement the ESMS Monitoring and Performance Plan.	2. Evidence of implementation.	2. As part of the ESCR.
1.7	Grievance Mechanism	1. Develop an external Grievance Mechanism that: i) is available to all stakeholders; ii) ensures non-retaliation; iii) allows anonymous complaints; and iv) establishes an internal procedure for receiving, recording, and responding to complaints and grievances.	1. External Grievance Mechanism.	1. One month after financial closure.
		2. Disseminate the Grievance Mechanism to the public.	2. Evidence of dissemination.	2. Three months after a financial closure.

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		3. Implement the Grievance Mechanism.	3. Evidence of implementation.	3. Six months after financial closure, and, next, as part of the of the ESCR.
<b>PS 2: Labor and Working Conditions</b>				
2.1	Human Resources Policies and Procedures	1. Develop an Internal Labor Regulations that establishes the terms of the contract and employment, benefits, and other labor matters.	1. Internal Labor Regulations.	1. Prior to financial closure.
2.2	Workers' Organization	1. Identify unions relevant to the Company's operation and job categories.	1. List of unions identified.	1. One month after a financial closure.
		2. Join the identified unions.	2. Evidence of association.	2. Three months after financial closure.
2.3	Non-discrimination and Equal Opportunity	1. Develop a Code of Ethics and Conduct for employees and independent contractors.	1. Code of Ethics and Conduct	1. One month after financial closure.
		2. Disseminate the Code of Ethics and Conduct to employees and independent contractors.	2. Evidence of dissemination.	2. Three months after financial closure.
2.4	Grievance Mechanism	1. Develop an internal Grievance Mechanism that: i) is available to all stakeholders; ii) ensues non-retaliation; iii) allows anonymous complaints; and iv) establishes an internal procedure for receiving, recording, and responding to complaints and grievances.	1. Grievance Mechanism.	1. One month after financial closure.
		2. Disseminate the internal Grievance Mechanism	2. Evidence of dissemination.	2. Three months after a financial closure.
		3. Implement the Internal Complaints and Grievance Mechanism.	3. Evidence of implementation of the Complaints and Grievance Mechanism	3. Six months after financial closure, and, next, as part of the ESCR.
2.5	Occupational Health and Safety	1. Develop an Occupational Health and Safety Program.	1. Occupational Health and Safety Program.	1. Prior to financial closure.
		2. Implement an Occupational Health and Safety Program.	2. Evidence of implementation.	2. Three months after financial closure, and, next, as part of the ESCR.
2.6	Workers Engaged by Third Parties	1. Establish a Procedure for Verification of Independent Contractors and Suppliers that checks their compliance with labor law and occupational health and safety.	1. Procedure for Verification of Independent Contractors and Suppliers.	1. Two months after financial closure.
<b>PS 3: Resource Efficiency and Pollution Prevention</b>				
3.1	Resource Efficiency	1. Develop a Water Consumption and Energy Use Monitoring Plan for the Jardins Unit and Brooklin Unit.	1. Water Consumption and Energy Use Monitoring Plan for the Jardins Unit and Brooklin Unit.	1. Six months after financial closure.
		2. Implement the Water Consumption and Energy Use Monitoring Plan at the Jardins Unit.	2. Evidence of implementation of the Water Consumption and Energy Use Monitoring Plan.	2. Nine months after the start of operations at the Jardins Unit, and, next, as part of the ESCR.
		3. Implement the Water Consumption and Energy Use Monitoring Plan at the Brooklin Unit.	3. Evidence of implementation of the Water Consumption and Energy Use Monitoring Plan.	3. Three months after the start of operations at the Brooklin Unit, and, next, as part of the ESCR.
		4. Develop an Energy and Water Use Efficiency Program for the Jardins Unit.	4. Energy and Water Use Efficiency Program.	4. Six months after the start of operations at the Jardins Unit.
		5. Develop an Energy and Water Use Efficiency Program for the Brooklin Unit.	5. Energy and Water Use Efficiency Program.	5. Four months after the start of operations at the Brooklin Unit.

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		6. Implement an Energy and Water Use Efficiency Program at the Jardins Unit.	6. Evidence of implementation of an Energy and Water Use Efficiency Program	6. Twelve months after start of operations at the Jardins Unit, and, next, as part of the ESCR.
		7. Implement an Energy and Water Use Efficiency Program at the Brooklin Unit.	7. Evidence of implementation of an Energy and Water Use Efficiency Program	7. Ten months after startup of operations at the Brooklin Unit, and, next, as part of the ESCR.
<b>PS 4: Community Health, Safety and Security</b>				
4.1	Emergency Preparedness and Response	1. Develop an Emergency Preparedness and Response Master Plan.	1. Emergency Preparedness and Response Master Plan.	1. Three months after financial closure.
		2. Implement the Plan at the Jardins Unit and Brooklin Unit.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Develop a Change Management Plan.	3. Change Management Plan.	3. One month after financial closure.
		4. Implement the Change Management Plan at the Jardins and Brooklin Unit.	4. Evidence of implementation.	4. As part of the ESCR.
		5. Retain an independent consultant to review project compliance at both Units with the L&FS directives in the World Bank Group Environmental, Health, and Safety Guidelines ("ESH Guidelines") and develop an L&FS Master Plan	5. L&FS Master Plan.	5. Three months after financial closure.
		6. Retain an independent consultant to conduct a review of the stages of testing and commissioning of the L&FS systems and certify compliance with the L&FS Master Plan.	6. Letter from the Independent Consultant certifying compliance with the L&FS Master Plan for the Jardins Unit and Brooklin Unit.	6. Prior to startup of operations at each unit, respectively.