

PROJECT AEGEA - ÁGUAS DO RIO
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 Licensing	1. Meet all requirements for environmental and water abstraction licenses in all existing and future assets in Concession Blocks 1 and 4.	1. Periodic reports with a dashboard and indicators of compliance with the environmental and social licensing requirements and a sample of documents for verification.	1. The first report is to be submitted before the first disbursement. Subsequent reports are submitted annually as part of the Environmental and Social Compliance Report (ESCR).
		2. Obtain the necessary environmental licenses, water abstraction permits and approvals from intervening entities for all new assets to be implemented that require environmental licensing at Concession Blocks 1 and 4.	2. Environmental licenses, water abstraction permits and approvals.	2. Annually as part of the ESCR.
		3. Obtain the Fire Department Inspection Certificate (AVCB) in the assets of Blocks 1 and 4 for which this document is required pursuant to the laws of Brazil.	3. AVCBs for assets.	3. Annually in the ESCR.
		4. If the construction of the Guapiaçu Dam is confirmed, update the Environmental and Social Impact Study (EIA/RIMA) to include: i) the project rationale; ii) a study of technological and site alternatives; iii) a socioenvironmental baseline; iv) an assessment of socioenvironmental risks and impacts; v) a study of cumulative impacts; vi) a socioenvironmental management plan; vii) a summary of consultations with the affected communities; and viii) a summary of the public hearing in compliance with the laws of Brazil.	4. Updated EIA/RIMA for the Guapiaçu Project.	4. The EIA/RIMA if the dam is confirmed.
		5. If the construction of the Guapiaçu Dam is confirmed, obtain all licenses, grants and approvals required by the laws of Brazil.	5. Licenses, grants, and approvals	5. Before work begins.
1.2	Environmental and Social Management System	1. Update the corporate programs to prepare an Environmental, Social, Health and Safety Management System (ESHSMS) specifically for the Block 1 and 4 Concessions.	1. Environmental, Social, Health and Safety Management System.	1. Six months after the first disbursement.
		2. Prepare spreadsheets to identify aspects and impacts for maintenance, expansion, and requalification works at Concession Blocks 1 and 4.	2. Aspect and impact identification spreadsheets.	2. Six months after the first disbursement.
		3. Submit annual ESHSMS audit reports detailing detected nonconformities, including corrective action plans to close nonconformities.	3. ESHSMS audit reports.	3. Annually in the ESCR.
1.3	Emergency Preparedness and Response	1. Submit Emergency Action Plans (EAPs) for Block 1 and 4 assets, complying with the corresponding corporate guidelines, to include: i) procedures for communicating with interested parties; ii) staff training requirements; iii) simulations timeline; and iv) provisions for including disabled persons or individuals with reduced mobility as applicable.	1. EAPs for the sanitation assets in Blocks 1 and 4.	1. Six months after the first disbursement.
		2. Implement the EAPs.	2. Evidence of implementation	2. In the ESCR.
		3. Submit an annual report on emergencies recorded, personnel training and simulations conducted.	3. Report on emergencies, personnel training, and drills.	3. Annually in the ESCR.
1.4	Gender Risks	1. Prepare a Gender Violence Prevention Program that reaches employees and outsourced workers for all Project units and that establishes: i) a timeline for awareness activities; ii) information dissemination strategies; and iii) prevention measures.	1. Program to Prevent and Fight Moral and Sexual Harassment.	1. Three months after the first disbursement.
		2. Adopt the Gender Violence Prevention Program.	2. Evidence of implementation.	2. In the ESCR.
		3. Prepare a Gender Diversity Program that: i) develops strategies for promoting gender diversity among employees; ii) promotes strategies for hiring, developing,	3. Gender Diversity Program.	3. Six months after the first disbursement.

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		and promoting women, members of the LGBTQI+ community and minorities; and iii) sets goals for wage equality and diversity between hierarchical levels.		
		4. Implement the Gender Equality Program.	4. Report on the implementation of the Gender Equality Program.	4. In the ESCR.
1.5	Adaptation to Climate Change	1. Prepare a Climate Change Risk and Impact Management Program, to include existing and new assets in Blocks 1 and 4 and focusing on the following: i) actions to forecast risks and impacts associated with climate change; ii) classification of the vulnerability of existing and new assets to climate change; iii) identification of priority assets for adaptation purposes; and iv) prepare and implement adaptation projects.	1. Climate Change Risk and Impact Management Program.	1. Nine months after the first disbursement.
		2. Implement the Climate Change Risk and Impact Management Program.	2. Progress reports.	2. In the ESCR.
1.6	Engagement with Interested Parties	1. Prepare a report that summarizes complaints received from third parties, including the results of the Afluentes Program, the Vem com a Gente Program, and other actions to engage with interested parties.	1. Progress reports.	1. In the ESCR.
		2. Update the document entitled "Ongoing Preparation of Reports on Affected Communities," and insert a methodology to conduct Informed Consultation and Participation (CIP) procedures for works with greater impact.	2. Document updated: "Ongoing Preparation of Reports on Affected Communities."	2. Before the first disbursement.
PS 2: Labor and Working Conditions				
2.1	Human Resources Policy	1. Prepare a Human Resources Policy that consolidates information on the working day, wages, overtime, compensation and benefits, health services, education benefits, services for employees who are mothers, right to freedom of association, etc.	1. Human Resources Policy.	1. Before the first disbursement.
		2. Disseminate the Client's Human Resources Policy to all employees (direct and, as applicable, to outsourced workers).	2. Evidence of dissemination.	2. Two months after the first disbursement and thereafter in the ESCR.
		3. Incorporate the Human Resources Policy into employee integration training.	3. Integration Activities Register.	3. Six months after the first disbursement and thereafter, in the ESCR.
2.2	Retrenchment	1. If there are collective dismissals, prepare a Staff Downsizing Plan that contains: i) dismissal guidelines and procedures, with specifications on remuneration and compensation; ii) strategies and procedures to absorb as many employees as possible; and iii) a plan to communicate with employees and outsourced workers.	1. Workers Downsizing Plan.	1. If there are collective dismissals.
		2. Implement the Staff Downsizing Plan.	2. Evidence of implementation	2. In the RCAS.
2.3	Grievance Mechanism	1. Prepare an internal grievance mechanism that: i) is available to employees and outsourced workers; ii) ensures confidentiality and nonretaliation for the complainant; iii) can be used to file anonymous complaints; and iv) establishes an internal process to receive, record and respond to complaints.	1. Grievance Mechanism Manual.	1. Before the first disbursement.
		2. Disseminate the Grievance Mechanism to workers and outsourced workers.	2. Evidence of disclosure.	2. Six months after the first disbursement, and hence in the ESCR.
		3. Implement the Grievance Mechanism.	3. Evidence of implementation, with a record of complaints and claims.	3. In the ESCR.
2.4	Occupational Health and Safety	1. Prepare the Risk Management Program in all operating units.	1. Risk Management Program for all operating units.	1. Before the first disbursement.
		2. Prepare the Risk Management Program in all new operating units.	2. Risk Management Program for all new units.	2. One month after each new unit opens.
		3. Implement the Risk Management Program in all operating units.	3. Evidence of implementation.	3. In the ESCR.

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		4. Prepare a Training Timeline for employees and outsourced workers in all units, to include: i) mandatory professional development training as determined by the Rule for EHS Training Procedures; ii) training on the applicable Brazilian Regulatory Norms; and iii) refresher training and training updates for employees and outsourced workers.	4. Training Timeline.	4. Before the first disbursement
		5. Implement the Timeline to achieve the goal of 100% of scheduled training.	5. Evidence of Timeline implementation.	5. In the ESCR.
		6. Prepare the Health and Safety Training and Dialog Program for all employees and outsourced workers that includes the following in addition to information about the procedure: i) information dissemination strategies; ii) ongoing periodic updating of procedures and the Health and Safety Dialog on Accident and Incident Reporting; and iii) a timeline.	6. Health and Safety Training and Dialog Program.	6. Before the first disbursement and thereafter, in the ESCR.
		7. Implement the Health and Safety Training and Dialog Program on Accidents and Incidents.	7. Evidence of implementation.	7. Six months after the first disbursement and thereafter, in the ESCR.
		8. For accident and incident management: i) Report occurrences and begin preparing the Workplace Accident Report (CAT) in case of injury by the statutory deadline; and ii) ensure that accident reporting and investigation processes are conducted in accordance with company procedures.	8. Consolidated report by region with accident reporting and investigation indicators.	8. In the ESCR.
		9. Prepare a technical instruction on Support Infrastructure Conditions for employees and outsourced workers that sets forth: i) minimum requirements for required infrastructure (toilets, kitchen, drinking fountain, closet, space for meals and rest space, spaces for preventing gender violence); ii) hygiene and conservation conditions to be observed; and iii) monitoring and recording procedures to be implemented.	9. Technical Instruction on the Support Infrastructure Conditions.	9. Before the first disbursement.
		10. Implement a rule on Support Infrastructure Conditions for all units that are beginning to operate.	10. Progress report on the implementation of the rule on Support Infrastructure in all new units.	10. Annually in the ESCR.
		11. Map the support infrastructure conditions for employees and outsourced workers in all units.	11. Map of support infrastructure conditions.	11. Before the first disbursement.
		12. Prepare a Corrective Plan that meets the guidelines set by the rule on Support Infrastructure Conditions.	12. Correction Plan.	12. Before the first disbursement.
		13. Implement the Corrective Plan.	13. Evidence of implementing the Correction Plan.	13. Three months after the first disbursement, and thereafter, in the ESCR.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Pollution Control	1. For each asset in Blocks 1 and 4 that generates solid waste, submit a Plan to Upgrade the Facilities for Storing Hazardous Products and Waste, to include: i) making surfaces impermeable; ii) a separated drainage system for storage areas connected to water and oil separation boxes; iii) adequate ventilation; iv) protection from unauthorized access; and v) appropriate signs for hazardous waste and products.	1. Plan to Upgrade the Facilities for Storing Hazardous Products and Waste.	1. Before the first disbursement.
		2. Implement the Plan to Upgrade the Facilities for Storing Hazardous Products and Waste in Blocks 1 and 4.	2. Report on the implementation of the Plan to Upgrade the Facilities for Storing Hazardous Products and Waste.	2. In the ESCR.
		3. Implement the Corporate Solid Waste Management Program (SWMP) in all existing operational assets and those that will be implemented in Blocks 1 and 4 in the future.	3. Annual report on the implementation of the SWMP in assets.	3. Annually, in the ESCR.

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		4. Submit consolidated reports for each Sewage Treatment Plants (STP) assessing compliance with the standards in CONAMA Resolution 430/2011 and INEA Operational Rule 45.	4. Annual report on monitoring the quality of treated sewage.	4. Annually, in the ESCR.
		5. Perform monthly monitoring using laboratories accredited in accordance with ISO Standard 17.025 of the following treated sewage parameters: i) BOD; ii) pH; iii) sedimentable solids; iv) COD, v) total nitrogen; vi) total phosphorous; vii) oil and grease; viii) total coliforms; and ix) thermotolerant coliforms.	5. Monitoring reports.	5. Monthly records and a summary in the ESCR.
		6. Submit consolidated reports on the results of the Sludge Management Plan, including existing and future STPs in Blocks 1 and 4.	6. Report on the Sludge Management Plan.	6. In the ESCR.
		7. Conduct a campaign to measure and control odors around each STP.	7. Report on odor measurement and control.	7. Six months after the first disbursement and thereafter, in the ESCR.
3.2	Greenhouse Gases	1. Submit the calculation of greenhouse gas emissions for the year ending for concession holder operations in Blocks 1 and 4.	1. Calculation of greenhouse gases.	1. Annually, in the ESCR.
		2. Submit projections of greenhouse gas emissions for the following year.	2. Projections for greenhouse gas emissions.	2. Annually, in the ESCR.
3.3	Resource Efficiency	1. Submit reports on the performance of the Water Losses Management Program developed by the concession holder in Blocks 1 and 4.	1. Report on the Water Losses Management Program.	1. In the ESCR.
PS 4: Community Health, Safety and Security				
4.1	Prepare and Secure Infrastructure and Equipment	1. Prepare a Corporate Environmental, Social and Traffic Management Plan for Works with guidelines for preparing specific plans for each works, including: i) works isolation and signage; ii) works to minimize inconvenience to third parties; iii) advanced communication plan for stakeholders; iv) safety measures to prevent accidents; v) management of air pollution; vi) management of solid waste and sewage from structures; and vii) traffic management measures.	1. Corporate Environmental, Social and Traffic Management Plan for Works.	1. Before the first disbursement.
		2. Implement the Environmental, Social, and Traffic Management Plans specific to each works in Blocks 1 and 4.	2. Report on the environmental, social and traffic management for works.	2. In the ESCR.
4.2	Security Staff	1. Prepare the Security Plan for existing and future assets in Blocks 1 and 4.	1. Security Plan.	1. Six months after the first disbursement.
		2. Implement the Security Plan.	2. Evidence of implementation.	2. In the ESCR.
PS 5: Land Acquisition and Involuntary Resettlement				
5.1	Project Preparation	1. If the Guapiáçu Dam is confirmed, submit an assessment of alternatives in the updated Project EIA/RIMA to ensure that the Project generates as little impact as possible on involuntary resettlement of families and loss of agricultural areas.	1. Updated EIA/RIMA for the Guapiáçu Dam.	1. Before construction begins.
5.2	Involuntary Resettlement and Economic Displacement	1. If the construction of the Guapiáçu Dam is confirmed, prepare a complete Resettlement and Restoration of Livelihoods Action Plan for all families that the project will affect.	1. Resettlement and Restoration of Livelihoods Action Plan.	2. Before construction begins.
		2. If the construction of the Guapiáçu Dam is confirmed, implement the Resettlement and Restoration of Livelihoods Action Plan.	2. Evidence of implementation.	2. In the ESCR.
		3. If the construction of the Guapiáçu Dam is confirmed, prepare an external audit of the Resettlement and Restoration of Livelihoods Action Plan for Families Affected by the Construction of the Guapiáçu Dam.	3. External audit of the Resettlement and Restoration of Livelihoods Action Plan for Families Affected by the Construction of the Guapiáçu Dam.	3. Three years after the families are resettled.
		4. For the other assets in Blocks 1 and 4 whose implementation will result in involuntary resettlement or economic displacement of families, prepare an Involuntary Resettlement and Restoration of Livelihoods Framework.	4. Involuntary Resettlement and Restoration of Livelihoods Framework.	4. Before the first disbursement.

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		5. Implement detailed actions in the Involuntary Resettlement and Restoration of Livelihoods Framework, as necessary.	5. Reports on the implementation of the Involuntary Resettlement and Restoration of Livelihoods Framework.	5. Throughout the project, whenever the Framework needs to be activated.
		6. As applicable, perform an external audit to assess the results of implementing the Involuntary Resettlement and Restoration of Livelihoods Framework.	6. External audit of the Involuntary Resettlement and Restoration of Livelihoods Framework.	6. After the final reports are delivered for each resettlement/restoration of livelihoods operation.
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
6.1	Biodiversity Protection and Conservation	1. As applicable, submit Biodiversity Action Plans (BAP) to control potential risks and impacts of the sanitation assets in Blocks 1 and 4 on biodiversity (modified habitats with significant amounts of biodiversity, natural or critical habitats).	1. Biodiversity Action Plans specifically for assets that generate impacts on biodiversity.	1. Before interventions that impact biodiversity.
		1. Implement the Biodiversity Action Plans.	2. Evidence of implementation.	2. In the ESCR.
PS 7: Indigenous People				
7.1	Prevention of Adverse Impacts	1. If indigenous people or traditional communities are identified in the Project areas of influence, a competent consultant is to be hired to prepare an Impact Assessment and Basic Environmental Plan for Indigenous and Traditional Communities, as applicable, in accordance with current statutory requirements and IFC Performance Standard 7.	1. Impact Assessment and Basic Environmental Plan for Indigenous and Traditional Communities.	1. Before activities begin if indigenous people or traditional communities are identified in the Project areas of influence.
PS 8: Cultural Heritage				
8.1	Protection of Cultural Heritage in Project Preparation and Implementation	1. If there are plans that may affect protected buildings or material or immaterial cultural heritage, a competent consultant is to be hired to prepare a Cultural Heritage Impact Assessment and a Cultural Heritage Management and Education Program as applicable in accordance with current statutory requirements.	1. Cultural Heritage Impact Assessment and Cultural Heritage Management and Education Program.	1. If material or immaterial impacts on cultural heritage are observed before activities begin.
8.2	Unexpected Findings	1. Prepare a procedure for unexpected findings to protect artefacts of archeological or cultural interest that may be found during construction.	1. Procedure for unexpected findings.	1. Before the first disbursement.
		2. Train the construction coordinators and contractors in charge of performing the work in the procedure for unexpected findings.	2. Reports on training for employees and outside parties in the procedure for unexpected findings.	2. In the ESCR.
		3. Implement the procedure for unexpected findings.	3. Reports on unexpected findings.	3. In the ESCR.