# **1. GENERAL INFORMATION ON THE SCOPE OF THE IIC ENVIRONMENTAL AND SOCIAL REVIEW**

Terminal Zárate S.A. (hereinafter Terminal Zárate) is a port belonging to the Grupo Murchison.<sup>11</sup> It is located on the shores of the Paraná de las Palmas river, in the province of Buenos Aires, Argentina, in an industrial area of the city of Zárate, 80 km northeast of the city of Buenos Aires. Terminal Zárate has been designed as a port for the transfer of containers, general goods (except for fuel and hazardous substances), and vehicles (motor vehicles, trucks, and agricultural machinery). The port premises, located some two 2 km north of the urban enter of Zárate, covers a total area of 218 hectares, has a complement of 977 employees (both its own staff and temporary staff), and has a container mobilization capacity of 210,000 TEUs/year.<sup>11</sup>

Terminal Zárate has requested financial support from the Inter-American Investment Corporation (IIC) to extend the length of the existing pier 94 meters northward (it is now 385 meters long) and to purchase a new 80-ton capacity gantry crane. Currently, the central portion of the pier is used to handle containers, while the ends are reserved for transferring vehicles. Expansion of the pier is part of the port terminal's Master Expansion Plan and will make it possible to receive two Post-Panamax ships at the same time, in addition to dividing the transfer of vehicles in general cargo operations into sectors. The time required for the construction work, estimated at 12 months, will depend in part on the methodology to be adopted. Dredging is not expected to be necessary.

The environmental and social due diligence (ESDD) technical visit was conducted on June 13, 2017 by staff from the IIC Environmental, Social, and Governance Division. Prior to the visit, IIC staff reviewed the project's EIA study and the documentation on environmental, social, and health and safety management at Terminal Zárate. The IIC representative was accompanied by staff from the company's Safety, Health, and Environment and Human Resources departments.

# 2. ENVIRONMENTAL AND SOCIAL CLASSIFICATION and RATIONALE

According to the IIC's Environmental and Social Sustainability Policy, the project has been classified as a Category **B** operation, as it could produce environmental and social impacts and risks of medium significance, that can be anticipated and minimized through the application of adequate design criteria and controlled through the application of internationally recognized management practices.

The main impacts for the project construction phase, as identified in the EIA study,<sup><sup>31</sup></sup> notably include possible water and soil pollution from demolition waste and oil spills affecting aquatic life, air pollution from the emission of combustion gases and airborne dust, and noise generation produced by machinery and vehicles. For this phase, the main occupational health and safety risks will be respiratory risks (due to exposure to smoke, dust, fumes, and gases), thermal risks (hot work), mechanical risks (working at heights, operating vehicles, lifting cargo, falling tools, blows, entrapment), and electrical risk.

The more significant impacts identified for the operational phase are possible water pollution (and effects on river biota) due to accidental spills of contaminants and waste, air pollution due to combustion gases produced by machinery and vehicles, and port ship traffic interference in the movement of commercial ships and aquatic activities (tourist, sports, and other activities) carried out in the river's waters. One of the most significant positive impacts to be noted is the potential increase in demand for labor, particularly during the construction phase. The main occupational risks linked to the operating phase will be mechanical (falls at various levels, blows, becoming trapped while handling cargo, and collision due to improper vehicle handling), ergonomic (lifting cargo), and electrical.

# 3. ENVIRONMENTAL AND SOCIAL CONTEXT

The prevailing climate in the project area is subhumid and humid mesothermal. The annual average temperature is 17.1° C, annual average precipitation is 1,066.1 mm, average relative humidity is 75%, and average wind speed at a height of two meters is 9.1km/h. The typology of geological formations corresponds to valleys flooded by alluvial rivers, meaning that they form their own channel due to dragged sediment. Studies conducted in the lower delta area (Wermter et al., 1977; Gómez and Ferrao, 1986) indicate that the predominant soils in this sector belong to the order of entisols and, to a lesser extent, the mollisols. Soils in the low and flood-prone sectors close to water courses show little depth and an absence of some horizons, evidence of greater geomorphological dynamics that interferes in soil formation processes. The sector where the port is located is in an area of very limited seismic risk.

The principal hydrological element is the Paraná de las Palmas river, one of the main branches of the Lower Paraná river (the other branch is the Paraná Guazú). The historical average flow of the Paraná is  $16,000 \text{ m}^3$ /s (with lower values of  $4,000 \text{ m}^3$ /s and maximum values of  $60,000 \text{ m}^3$ /s).

The existing aquifer, called the "Puelchense Aquifer," is located starting at a depth of 25 meters and is suitable for human consumption and for industrial and agriculture uses. Above this formation is the Epipuelche aquifer, located in the Pampean sediments, with clay and clay-loam levels and low to very low permeability. The phreatic level is located at shallow depth, at between approximately 0.50 to 0.65 meters. The water table (phreatic layer) is not stable but fluctuates periodically according to the rainfall regime, surface runoff, and the topography of the terrain, among other factors.

As of 2010, the population census recorded 114,269 inhabitants in the city of Zárate. The city has significant commercial and industrial activity, notably in the automotive, paper, chemical, and beer industries. There are two sailing clubs and private piers. There are frequent recreational and sport fishing activities on the river banks.

The area immediately surrounding the port terminal has a distinctly industrial profile. Adjacent to the Terminal Zárate, toward the south and southwest, a 40-hectare site contains the old facilities of a chemicals factory (sulfuric acid, nitric acid, sulfates, and later electrolytic zinc). This industrial establishment was created in the early years of the 20<sup>th</sup> century and abandoned in 1983 and has become substandard housing for some families. Beyond the immediate surroundings, extensive agriculture, livestock, and forestry operations are being developed. The main crops are wheat, corn, soy, and sunflower. In terms of livestock, the raising of cows, horses, sheep, hogs, and fowl predominates. There is also significant production of citrus fruits and other varieties of fruit.

The natural ecosystem is continental and characterized by pastures. In the delta area, there is a significant forestry operation. Aquatic plant species include water hyacinth and reeds; land species include thistles, grasses, restharrow, timber, cockspur coral, willows, and palms. Notable fauna characteristic of the region include marsh deer, otters, capybaras, weasels, and ferrets. The birds most often seen include heron, chaja, duck, owls, and grebes. Predominant reptiles are turtles, lizards, and snakes (green snake, false Yarará, Yarará, rattlesnake, and coral snake). The rivers have sea catfish, silverside, dorados, bogas, surubi, and manguruyú in abundance. The marsh deer has been declared an endangered species.

The main access route by land to Terminal Zárate is called the Costa Brava Road (some 8 km long), linking the port with Route 9 (Buenos Aires – Rosario Highway) and indirectly with Routes 12 and 14 (crossing the complex of Zárate-Brazo Largo bridges), land routes connecting to Brazil. Truck access on the Costa Brava Road does not interfere with automotive traffic in the city of Zárate; river entry via the Paraná de las Palmas river makes it possible to receive ocean-going vessels as well as vessels

coming from the Argentine coast and Paraguay. Overseas access is through the Intermediate Channel, which connects to the Access Canal to the Port of Buenos Aires. Terminal Zárate also has rail access at the Intermodal and Logistics Terminal (*Terminal Intermodal Logística* – TIL Plant), located one km from the port, allowing access by the New Central Argentina (NCA) and Belgrano Freight railways.

# 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

Terminal Zárate has been certified under ISO 9.001 (quality) and ISO 14.001 (environment). Health and safety risks are managed based on specific procedures. In addition, the International Ship and Port Facility Security Code (ISPS Code) promoted by the Maritime Safety Committee of the International Maritime Organization has been introduced and certified. The organizational and functional structure of these systems is aligned with the principal requirements established in this regard in IFC Performance Standard No. 1.

The procedures are currently implemented by means of an IT platform (Loyal). It should be noted that Terminal Zárate is in the process of implementing the new version of ISO 14001:2015, for which purpose it is doing a review and update of its policy, objectives, targets, processes, and assigned resources corresponding to 2017.

# 4.1.b Policy

Terminal Zárate has adopted an Environmental and Health and Safety Policy, a Code of Corporate Conduct, and a Manual of Human Resources Policies. The content of those documents is generally aligned with the requirements of the IFC Performance Standards.

However, a review of the content of Terminal Zárate's Human Resources Policy identifies some aspects that could be supplemented to achieve better alignment with the requirements of IFC Performance Standard No. 2.

# 4.1.c Identification of risks and impacts

As part of its management system, Terminal Zárate uses matrices identifying potential environmental and social impacts and occupational risks.

Although the main environmental and social impacts and occupational risks of the construction work on the pier have been identified in the respective EIA study, Terminal Zárate should supplement those results by considering specific and updated aspects of the worksite and the construction method to be used

# 4.1.d Management programs

Terminal Zárate has developed a series of general procedures and other operational procedures it uses to manage quality and environmental aspects as well as the health and safety risks associated with its activities. As reported during the assessment visit, Terminal Zárate is preparing to incorporate its own practices under the STOP safety program<sup>(4)</sup> in its supervision and audit procedures, for both its own staff and contracted staff.

However, Terminal Zárate does not have a specific procedure for managing contractors and suppliers with regard to health, safety, and the environment, and should develop a specific procedure for that management.

# 4.1.e Organizational capacity and competency

Terminal Zárate's organizational structure shows a General Management, to which nine management units, including Human Resources, report. The safety, health, and environmental management unit as well as the unit responsible for corporate social responsibility report to Human Resources.

Terminal Zárate's Human Resources Policy includes the implementation and maintenance of the occupational risks management system. However, the assignment of responsibility for the implementation and maintenance of the environmental and health and safety management system is not clear. Terminal Zárate should explicitly assign and document responsibility for the implementation and maintenance of the environmental and health and safety management system.

Terminal Zárate has prepared and is implementing an Annual Training Plan for 2017 for its staff. The plan includes subjects related to aspects of quality, the environment, occupational health and safety, physical safety, the use of IT tools, administrative management, and other subjects. Terminal Zárate has been conducting an average of three emergency simulations per year. In general terms, the content of that Training Plan is considered adequate.

# 4.1.f Emergency preparedness and response

Terminal Zárate has adopted an Emergency Plan that is applicable to all terminal facilities and all personnel (own staff, contracted staff, and visitors). However, this plan should be adapted to make it compatible with the requirements of Performance Standard No. 1.

The emergency plans of the construction firm selected for expanding the pier and the company providing the gantry crane will have to be developed in line with the Emergency Plan revised by Terminal Zárate and with the results from the identification of risks and impacts done specifically for the project.

The operational areas of the Terminal Zárate pier are protected by two firefighting systems equipped with hydrants and fed by two 45 m3/h fire pumps (one active and another in reserve). In the vehicle and container storage yards, there are 620 regularly distributed (about every 40 m in both directions) 50 kg and 10 kg capacity dry chemical powder extinguishers.

The terminal has new fire detection and suppression facilities in the 8,000 m<sup>2</sup> long logistics warehouse<sup>15</sup> where general merchandise is stored (potential producers of class A and class B fires). The detection components consist of smoke detectors and high laser barriers (three barriers per warehouse); the fire suppression components include automatic sprinklers (K11), hydrants, and manual extinguishers. The pump room has a motor pump and an electric pump fed by a generator (each with a flow of 120 m3/h) and a jockey pump for maintaining system pressure. The fire suppression system is supplemented with two 120 m3 tanks and an alarm center. At the time of the visit, the installation had not yet been inspected by the fire department of the city of Zárate, the entity that must approve the firefighting system.

Hazardous goods are kept in containers. Emergency situations associated with potential spills of hazardous substances or hazardous gas leaks are anticipated and will be controlled by Terminal Zárate under application of specific procedures.

Although Terminal Zárate manages and documents the occurrence of accidents and incidents, it is not clear that a specific procedure has been prepared for this. Terminal Zárate should develop a specific procedure for managing environmental and personal accidents and incidents.

## 4.1.g Stakeholder engagement

Terminal Zárate disseminates contact methods on its website so that anyone in the community can submit a complaint or suggestion to Terminal Zárate, although it does not have a documented mechanism for receiving, resolving and communicating the results of any complaints from third parties and should implement such a mechanism as part of its communication procedures.

#### 4.1.h Monitoring and review

As part of its environmental management system, Terminal Zárate has prepared a Legal Monitoring Plan that includes an environmental monitoring plan providing for periodic measurement of air quality parameters, gas emissions (yearly, corresponding to drying and spraying booths in automobile repair shops), surface water quality (yearly), disturbing noises, well water (yearly), treated effluent (half-yearly), and discharges to a body of water (half-yearly). In the area of occupational health and safety, the Legal Monitoring Plan provides for monitoring air quality in paint shops including chemical contaminants and particulate matter (yearly), measurements of earthing resistance (yearly), noise levels (annual), pressure equipment (yearly), lighting level (yearly), safety audits of fuel tanks (yearly), and bacteriological analysis (half-yearly), and physicochemical analysis (yearly) of water for human consumption provided in dispensers.

In addition to the Legal Monitoring Plan, Terminal Zárate has prepared a Voluntary Monitoring Plan that includes the measurement of neighbor noise (yearly), audit of the dining area (yearly), microbiological analysis of processed and semi-processed products (monthly), studies of heat load in the work environment (yearly), and vibration studies (yearly).

Monitoring records allow for the conclusion that to date the figures related to the emission of contaminants generated in automotive repair shops, workplace noise levels, and earthing resistance comply with current legislation.

It is noted that the quality measurements on gas emissions are provided only for emissions generated in paint spraying booths in vehicle repair shops and do not include the monitoring of emissions from generators. It should be emphasized that the results related to the quality of liquid effluents from treatment plants, the quality of well water, the quality of water for human consumption, environmental noise, air quality, and food testing analyses were not available for the review carried out and that the results of the legal review done for 2016 (results expressed in the "MA Matrix – June 2017") indicate that some of the parameters related to liquid effluents measured in 2016 exceed the legal limits.

Terminal Zárate should prepare a documented procedure that indicates the methodology to be used to perform Environmental and Social and Health and Safety Monitoring (ESHS); the ESHS Monitoring Plan should be included as a program of monitoring activities and be part of that procedure. The accident rates developed by Terminal Zárate include severity, frequency, and incidence rates.<sup>[6]</sup> At the time of the assessment, only the data for the company's own staff were available. The trend in the rates for own staff <sup>([7])</sup> between 2016 and so far in 2017 shows a significant reduction in the month of May (-73% for the frequency rate; -100% for the severity rate; -100% for the incidence rate), indicating a significant improvement in the area of risk prevention with respect to the company's own staff.

# 4.2 Labor and Working Conditions

#### 4.2.a Working conditions and management of labor relations

Terminal Zárate has a staff made up of 803 of its own workers and 174 temporary workers. The number of contracted personnel is estimated to be 250. The project construction phase is expected to require up to a maximum of 150 workers, creating about 15 permanent jobs for the operational phase.

There are five unions for workers at the terminal ([8]). As reported by Terminal Zárate, the unions' requirements are discussed and agreed upon through direct dialogue among the parties, and industrial actions may in some cases interfere with the terminal's normal operation (such as an action blocking entry to the terminal).

Terminal Zárate has prepared and is implementing a Human Resources Policy to establish the criteria to be applied for the hiring, training, and performance evaluation of its staff and temporary staff, also indicating mandatory standards, benefits granted, and planned activities promoting achievement of the company's strategic objectives.

The Terminal Zárate Code of Conduct clearly indicates that gender-based discrimination is not accepted by the company. It should be noted that currently only 10% of Terminal Zárate staff are women. The company's objective is to increase that percentage over the short and medium term.

Terminal Zárate has clearly established an anonymous and confidential reporting line administered by the Resguarda firm. The substance of the complaint or suggestion is received by a telephone operator who directs it to an analysis committee consisting of the general manager and the administration and finance manager. In addition, the Code of Conduct establishes an open door policy that must be adopted by all supervisors, chiefs, and managers to encourage employees to express their concerns directly or in writing, without any reprisals being taken for this reason. Terminal Zárate should extend the ability to submit anonymous and confidential reports to include temporary, contracted, and subcontracted personnel.

As part of its Corporate Social Responsibility program, Terminal Zárate grants various types of benefits to its employees such as promoting and participating in recreational and educational events, an in-plant dining area at subsidized prices, gifts for anniversaries, free English classes, shared family days, secondary school for adults, promoting healthy diets (there is a nutritionist), workplace stretching and exercise classes, free access to the area sailing club, among others.

# 4.2.b Occupational health and safety

Terminal Zárate appropriately manages the occupational health and safety risks associated with its activities.

In accordance with the legal requirements, the Joint Health and Safety Committee has been established; it consists of representatives from labor organizations, five unions, and the company's environmental and health and safety management. It should be noted that since late 2015 staff from Terminal Zárate's health and safety team have been participating in the Quadripartite Commission of the Office of the Superintendent of Occupational Risks (*Superintendencia de Riesgos del Trabajo* - SRT) on the preparation of standards of good practice in the safe handling of containers, as part of the National Primary Prevention Program carried out by the SRT. In addition, since April 2017, personnel responsible for managing safety and health at Terminal Zárate make up the team of the Safety, Health, and Environmental Commission of the Chamber of Commercial Private Ports.<sup>[9]</sup>

Terminal Zárate has a continuous emergency medical care service. It has adequate facilities, a physician specializing in labor matters (from 8:00 a.m. to 5:30 p.m.), and continuous nursing service.

# 4.3 Efficient resource management and pollution prevention

Terminal Zárate does not yet have an inventory of greenhouse gases (GHG) and should identify the methodology and prepare a GHG inventory.

Terminal Zárate has 21 generators producing between 25 and 505 kVA. The higher power generators are used to supply power to refrigerated containers (reefers). The quality of the combustion gases is not systematically analyzed and their measurement and analysis should be included in the Monitoring Plan.

The terminal also has 12 modular effluent treatment plants that process about 119 m3/day of effluent, which is periodically analyzed at dumping points in accordance with legal requirements. It should be emphasized that to date the results of those analyses show some quality parameters that exceed the legal limits. The physico-chemical composition of the groundwater used to wash machinery, containers, and vehicles is not analyzed and this analysis should be included in the Monitoring Plan.

Terminal Zárate manages the solid and liquid wastes associated with its port terminal activities in compliance with current legislation. Special or hazardous solid wastes are temporarily stored in an appropriate site until they are removed by an authorized company. Liquid wastes from administrative activities and vehicle washing are treated in modular plants and in grease separators, respectively, before being discharged into the Paraná river.

Terminal Zárate has 25 wells drawing groundwater for the sanitary facilities, for washing vehicles and machinery, and for other uses. The total volume of water used amounts to 126 cubic meters per day. Water intended for human consumption is purchased in containers from an authorized company (consumption of 60 cubic meters per month). A flowmeter has been installed in each well to determine the flow demanded.

Terminal Zárate will design and implement plans to reduce water consumption. Such a strategy has been implemented for the last three years in the (PDI) carwash, where sand filters were installed in addition to a "man down" system to automatically shut down the power washers when washing is completed in order to avoid wasting water.

It should be mentioned that Terminal Zárate separates out the wood used to secure the containers, donating it to schools and woodworking shops. Used pallets are classified for reuse while most of them are returned to the clients.

The water used to wash the containers, after passing through a physico-chemical and biological treatment plant, is used for irrigation. The muds produced are treated as special waste as indicated by legislation.

Average electrical consumption is 97,500 KWh/month. Terminal Zárate is identifying the applicable methods for reducing the consumption of electricity and paper. The first steps in this process have been gradually replacing ordinary bulbs with LED bulbs and promoting the replacement of printed receipts with digital receipts.

# 4.4 Community health and safety

Terminal Zárate's activities do not have significant direct impacts on the neighboring community.

Trucks entering and leaving the terminal (an estimated 260 trucks per day) travel on the access and exit road for the Zárate industrial area and do not interfere with city traffic. To avoid having trucks parked at the terminal entry and in the area of the pier, the company has provided a parking area exclusively for trucks inside the terminal (called the truck buffer area), which has sanitary facilities for the drivers and parking capacity for between 80 and 100 vehicles. The pier expansion work will not involve truck traffic exceeding those facilities' temporary ability to receive trucks and will thus not produce trucks lined up while waiting on the public road.

The state of repair of the road entering the industrial area is deficient. As reported by Terminal Zárate, its repair is the subject of treatment and planning between the Industrial Union of Zárate (which groups together industries in the area) and the municipality. Terminal Zárate should include the identification and evaluation of traffic-related risks.

Terminal Zárate promotes discussions in municipal participation centers directed to caring for the family and related to motherhood and early childhood, childhood nutrition, early stimulation, etc., contracting professionals from the Conin Foundation. It also promotes and provides internships for secondary students at its facilities.

# 4.5 Land acquisition and involuntary resettlement

The project does not require the acquisition of land nor will it result in the physical or economic displacement of any population.

# 4.6 Biodiversity conservation and natural resource management

The project will not have a significant impact on biodiversity and natural resources.

# 4.7 Indigenous peoples

The project is not expected to affect indigenous communities.

# 4.8 Cultural heritage

It is not anticipated that the project's activities will lead to finding archeological and/or paleontological material.

# 5. ENVIRONMENTAL AND SOCIAL ACTION PLAN

The Environmental and Social Action Plan (ESAP) for the project is summarized as follows:

| No. | Action  | Deliverable  | Delivery Date                      |  |  |  |  |  |
|-----|---|--|------------------------------------|--|--|--|--|--|
| PS  | PS 1: Assessment and Management of Environmental and Social Risks and Impacts   |  |                                    |  |  |  |  |  |
| 1.1 | Develop a text of the Human Resources<br>Policy aligned with the requirements of IFC<br>Performance Standard 2  | Human Resources Policy   | Prior to the first<br>disbursement |  |  |  |  |  |
| 1.2 | Develop matrices identifying specific<br>impacts and risks of the construction work<br>and tasks related to the assembly and<br>startup of the new gantry crane | Environmental, Social, and<br>Health and Safety<br>Identification and<br>Assessment Matrix for the<br>construction work and<br>assembly/startup of the<br>gantry crane | Prior to the first<br>disbursement |  |  |  |  |  |

| No  | Action   | Deliverable   | Delivery Date  |
|-----|--|---|--|
| 1.3 | Develop a Contractors and Suppliers<br>Management procedure aligned with the<br>legal requirements and IFC Performance<br>Standards.   | Contractors and Suppliers<br>Management Procedure   | Before Nov. 30, 2017   |
| 1.4 | Explicitly assign and document<br>responsibility for implementing and<br>maintaining the environmental and health<br>and safety management system  | Approved organizational<br>chart  | Prior to the first<br>disbursement   |
| 1.5 | During the phase of pier construction and<br>assembly of the crane to be purchased,<br>verify that company's own staff and<br>contractors assigned to project activities are<br>properly trained and, if necessary, plan to<br>conduct training courses for staff who need<br>them <sup>("")</sup> | Report identifying<br>assessment requirements   | Prior to the first<br>disbursement   |
| 1.6 | Amend the Emergency Preparedness and<br>Response Plan consistent with the<br>requirements of IFC Performance Standard<br>1   | Amended version of the<br>Emergency Preparedness<br>and Response Plan   | Before Nov. 30, 2017   |
| 1.7 | Prepare and implement an Environmental<br>and Personal Accident and Incident<br>Management Plan consistent with the legal<br>requirements and IFC Performance<br>Standards   | Accident and Incident<br>Management Procedure   | Before Nov. 30, 2017   |
| 1.8 | Terminal Zárate should institute this<br>mechanism as part of the External and<br>Internal Communications procedure (POG-<br>GEN-002-00), considering the complaints<br>and suggestions that could be received via<br>the website, contact telephone number, and<br>in writing.                    | Amended version of the<br>External and Internal<br>Communications Procedure   | Prior to the first<br>disbursement   |
| 1.9 | Develop a procedure for conducting<br>Environmental, Social, and Health and<br>Safety Monitoring, including a Monitoring<br>Plan   | <ol> <li>Environmental,<br/>Social, and Health and<br/>Safety Monitoring<br/>Procedure</li> <li>Environmental,<br/>Social, and Health and<br/>Safety Monitoring Plan</li> </ol> | <ol> <li>Prior to the<br/>first disbursement</li> <li>Periodically in<br/>the Environmental,<br/>Social, and Health<br/>and Safety<br/>Compliance Reports</li> </ol> |
| PS  | 2: Labor and Working Conditions  |   |  |
| 2.1 | Monitor women's participation as part of<br>the Terminal Zárate labor force, periodically<br>reporting the respective indicators   | Report women's<br>participation indicators in<br>the periodic Environmental<br>and Social Compliance<br>reports   | Periodically in the<br>Environmental,<br>Social, and Health<br>and Safety<br>Compliance Reports  |
| 2.2 | Include in the Code of Conduct a reference<br>to the anonymous and confidential reporting<br>mechanism administered by the Resguarda<br>firm; ii) extend the use of the anonymous<br>and confidential reporting line to include all<br>temporary, contracted, and/or<br>subcontracted personnel    | Amended version of the<br>Code of Conduct   | Prior to the first<br>disbursement   |

| No. | Action  | Deliverable   | Delivery Date   |  |  |  |  |  |
|-----|---|---|---|--|--|--|--|--|
| PS  | PS 3: Resource Efficiency and Pollution Prevention  |   |   |  |  |  |  |  |
| 3.1 | Prepare an Inventory of Greenhouse Gases.<br>The methodology to be adopted may be<br>based on the ISO 14064-1 Standard, Using<br>the Corporate Accounting and Reporting<br>Standard of the Greenhouse Gas Protocol<br>(GHG Protocol) as a working guide.  | Inventory of Greenhouse<br>Gases  | Before Nov. 30, 2017  |  |  |  |  |  |
| 3.2 | Analyze the water drawn from the subsoil<br>(in at least 50% of the 25 boreholes) to<br>verify its possible contamination.  | Laboratory analysis reports   | Periodically in the<br>Environmental,<br>Social, and Health<br>and Safety<br>Compliance Reports |  |  |  |  |  |
| 3.3 | Prepare and implement a documented<br>procedure for the management of solid and<br>liquid wastes  | Waste Management<br>Procedure   | Before Nov. 30, 2017  |  |  |  |  |  |
| 3.4 | Calculate and monitor performance<br>indicators on the subject of saving water,<br>electricity, and paper (or other<br>consumables)   | Identification and periodic<br>reporting of Environmental,<br>Social, and Health and<br>Safety Performance<br>Indicators (in the periodic<br>Environmental, Social, and<br>Health and Safety<br>Compliance Reports) | Periodically in the<br>Environmental,<br>Social, and Health<br>and Safety<br>Compliance Reports |  |  |  |  |  |
| PS  | PS 4: Community Health and Safety   |   |   |  |  |  |  |  |
| 4.1 | Terminal Zárate should include in its<br>impacts and risks identification matrix the<br>potential impacts and risks related to trucks<br>traveling on the terminal access road, and<br>identify preventive and corrective measures<br>that it could implement itself or that could<br>be proposed at the municipal level to<br>promote the reduction of those impacts and<br>risks. | Periodic reports on impacts<br>and risks that have been<br>identified, measures to be<br>implemented (reports in<br>the Environmental, Social,<br>and Health and Safety<br>Compliance Reports).                     | Periodically in the<br>Environmental,<br>Social, and Health<br>and Safety<br>Compliance Reports |  |  |  |  |  |

[1] See <a href="http://www.grupomurchison.com.ar/">http://www.grupomurchison.com.ar/</a>

[2] A TEU is the load capacity of a normalized <u>container</u> 20 feet (6.1 m) long by 8 feet (2.4 m) wide by 8.5 feet (2.6 m) high. Its capacity is 33 cubic meters

[3] "Terminal Zárate – Container Pier Extension – Environmental Impact Study – Larrague and Associates – Engineering Study – Ports – 24 February 2017).

[4] The STOP safety program (Safety Training Observation Program, developed by Du Pont) provides for the development of preventive measures based on improved observation skills for detecting unsafe conditions and/or actions.

[5] Goods held for safekeeping are stored in the logistics warehouse pending transport to their destination, for both export and import operations; operations are carried out to consolidate

containers, including grains loaded in bags and containers; bulk grains are also moved. The warehouse, monitored and guarded by Customs authorities, includes an x-ray scanner authorized by the Ministry of Health.

[6] Although Terminal Zárate does not provide the definition of the rates used, the commonly accepted definitions of those rates are transcribed as follows: Severity Rate: number of days lost for every million hours worked (number of days lost/number of hours worked) x 1,000,000; Frequency Rate: number of accidents for every million hours worked (number of accidents/number of hours worked) x 1,000,000; Incidence Rate: number of workers injured for every 1,000 workers exposed (number of workers injured/number of workers exposed) x 1,000).

[7] At the time of the review, the rates for contractors were not available.

[8] Unions: i) SUPA (United Argentine Ports Union); ii) Mobile Crane Operators; iii) AAEMM (Argentine Association of Merchant Marine Employees); iv) SCEP (Union of Port Dockworker Supervisors) and v) SEAMARA (Union of Chief Maritime Pointers and Related Positions of the Republic of Argentina).

[9] The Chamber of Commercial Private Ports (<u>http://www.camarapuertos.com.ar/</u>) provides the nucleus for the 35 port terminals in the Rosario area; the recently created Safety, Health, and Environment Commission is added to the already existing Legal Commission and Operational Commission.

[10] In accordance with IFC Performance Standard 1, Terminal Zárate should consider its contractors like its own employees with respect to aspects related to environmental, social, and health and safety management. Section 8 of that standard establishes as follows:: "Contractors retained by, or acting on behalf of the client(s), are considered to be under direct control of the client and not considered third parties for the purposes of this Performance Standard."