

## **Environmental and Social Review Summary (ESRS) Opy Tocantins' Women's Hospital and Maternity - BRAZIL**

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### **1. General Information of the Project, and Overview of Scope of IDB Invest's Review**

Opy Health (the Company or the Client) is a Brazilian company that invests in, implements and manages infrastructure projects in the healthcare and non-clinical hospital service sector. The transaction consists in a loan for the construction and operation of the Women's and Maternity Hospital of the State of Tocantins (the HMME, in Portuguese; the Hospital or the Project) in the municipality of Palmas, Tocantins. The Project involves a public-private partnership with the government of the State of Tocantins. The Company has a corporate office in the city of São Paulo.

The environmental and social due diligence (ESDD) process includes, among other things, a visit to the Project site; interviews and meetings with the Company's teams in charge of the sustainability, health and safety, and human resources areas, among others; and a review of the Client's environmental and social (E&S), and occupational health and safety information (OHS) information, such as: i) human resources policies; ii) health and safety management procedure; iii) annual sustainability report; iv) policy to hire and manage third parties; v) environmental licenses and authorizations; vi) environmental compliance reports for the works prepared by a specialized external consulting firm; vii) environmental impact assessment; viii) integrated management system; ix) E&S, health and safety monthly monitoring reports and indicators; x) emergency response plan; and xi) occupational risk management program, etc.

In order to guarantee the Project is committed to respecting and safeguarding human rights, does not tolerate retaliatory actions and is committed to providing for and assuring a safe environment so that the stakeholders can express their concerns with no fear of retaliation, the ESDD process also includes a review of Opy Health's human rights policy and code of ethics and conduct.

### **2. Environmental and Social Categorization, and Rationale**

In accordance with IDB Invest's Environmental and Social Sustainability Policy, the Project was classified as a category B transaction because it may give rise to the following risks and impacts, among others: i) generation of or increase in the OHS risks for payroll and third-party workers; ii) waste generation; in particular, medical and hazardous waste; iii) increased traffic in the areas close to the Project units; iv) generation of noise and vibrations during the Construction phase; and v) fire risks. These risks and impacts are estimated to have a medium-low intensity.

The Performance Standards (PSs) 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; and iv) PS4: Community Health, Safety, and Security.

### **3. Environmental and Social Context**

#### **3.1 General Characteristics of the Project Site**

The Project is located in the municipality of Palmas, Tocantins, Brazil, in the Plano Diretor Sul area, where there are other healthcare and social assistance public facilities. There are residential areas and unused plots in the surroundings.

The HHME will be deployed in an 24,000 m<sup>2</sup> total area, with 24,097.70 m<sup>2</sup> built and distributed in four floors. The Hospital will host 210 beds and: i) outpatient, emergency, and urgent care services; ii) diagnostic imaging services; iii) a surgical center; iv) a childbirth center; v) intensive care units; vi) a specialized care center for victims of sexual violence (SAVIS, in Portuguese); vii) a center for pregnant women, babies and postpartum care for women (CGBP, in Portuguese); and viii) support areas (reception, restaurant, administrative areas, common areas, storage and pharmacy, warehouse, among others).

The Project will be completed in two stages. The construction of the first stage was launched in 2025, which comprises the CGBP, the outpatient services and the restaurant. Additionally, the Company built a temporary office on the Project site with meeting rooms, a staff break room and toilets. The second stage will involve the construction of the Hospital with the rest of the described facilities and services.

The Project prepared an environmental impact assessment (EIA) which is consistent with the guidelines established by the environmental authorities<sup>1</sup>, and holds an installation license issued by the Municipal Environmental Foundation of Palmas, the relevant environmental agency. To start the work involved in the first stage, the Project obtained a construction permit<sup>2</sup> from Palmas Municipal Department of Sustainable Urban Development.

#### **3.2 Contextual Risks**

The municipality of Palmas, Tocantins, is the least populated state capital in Brazil, and records low violence rates as compared to others in the country. According to the Institute for Applied Economic Research (IPEA, in Portuguese), as the State of Tocantins does not border other countries, its location in the geographical center of Brazil constitutes an interstate corridor that enables the flow of illicit goods with the presence of criminal organizations<sup>3</sup>.

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<sup>1</sup> Resolutions CONAMA 01/86 and 237/97, and Resolution COEMA/TO 07/2005.

<sup>2</sup> A construction permit is an authorization issued by the municipal government to legally start the works.

<sup>3</sup> IPEA. *Atlas da Violência*. 2024.  
<https://www.ipea.gov.br/atlasviolencia/arquivos/artigos/9277atlasviolencia2024retratadosmunicipiosbrasileros.pdf>

However, the Project is located in a residential area, which is not densely populated, and is near other healthcare and social assistance public service centers. Therefore, no significant contextual risks have been identified in connection with the presence of the Project in the area.

#### **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 E&S Assessment and Management System**

Opy Health does not yet have a corporate environmental and social management system (ESMS), but it does have an integrated management system, covering the environmental, quality and health and safety management of projects, including projects certified under ISO 14000<sup>4</sup> and 45001<sup>5</sup>. The Company will prepare an ESMS that is specific for the Project.

Nonetheless, the construction company relies on its own environmental, health and safety management system.

###### **4.1.b Policy**

Even though Opy Health's annual report expresses its commitment to the good E&S performance of its activities and compliance with the sustainability indicators and the Sustainable Development Goals (SDGs), the Company still has no formal environmental policy in place. Therefore, it will prepare a policy to formalize its sustainability strategy and commitment to managing its E&S, and OHS aspects.

Opy Health has a human rights policy in place that establishes its commitment to respecting and promoting the protection of human rights in its operations and supply chain.

###### **4.1.c Identification of Risks and Impacts**

The EIA identified and assessed the impacts derived from the construction and operation activities of the Project in terms of the physical, biotic and social environments. Some of the main negative impacts and potential risks as identified are: i) intensified road traffic; ii) noise and vibration generation; iii) raising expectations; iv) impacts on the fauna and biodiversity; and v) disruptions to the landscape.

The Company will prepare an E&S risk and impact matrix that will consolidate the risks and impacts of the Project activities, and will be updated regularly.

###### **4.1.c.i Gender Risks**

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<sup>4</sup> ISO standard for environmental management systems

<sup>5</sup> ISO standard for OHS management systems

The human resources policy establishes the Company's commitment to promoting a fair, respectful work environment, and expresses zero tolerance for any form of threat, intimidation or harassment, whether verbal, physical, sexual or psychological in the workplace.

The Company's "Integrity Channel"<sup>6</sup> is supported by psychologists who deal with grievances, thus guaranteeing the potential victims are helped by specialists. Notwithstanding this, the Company will update its Integrity Channel management policy with specific procedures and guidelines for grievances related to gender-based violence.

In order to promote the safety and wellbeing of the female users of the HHME, the design considers the construction of adequate facilities; with naturally lit, properly sized spaces and labor rooms for respectful maternity care. The SAVIS has a separate entrance and patient circulation route to guarantee the female users' comfort and privacy. The CGBP will offer support and follow-up care for women who need ongoing care, but do not require hospital admission.

The HHME will have special restrooms and changing rooms for its female workers, as well as a lactation room, gender-segregated break rooms, and a staff lounge.

#### 4.1.c.ii Gender Programs

The Company has established a corporate goal of having 35% of leadership positions held by women, which happened in 2024. Program Mulheres na Liderança (Women in Leadership), launched in 2023, promotes the staff education with training sessions, workshops and internal mentorship.

Between 2024 and 2025, Opy Health hired the services of a specialized consulting firm that performed a diagnostic analysis on diversity and workers' inclusion, and is preparing an action plan for the next years to continue promoting diversity and women participation in the Company.

#### 4.1.c.iii Exposure to Climate Change

The Project is located in an area that is exposed to floods and variations in the precipitation patterns, as well as an increase in the number of days with extreme temperatures, mainly in a high-emission scenario. The construction activities may be interrupted by extreme rainfall and subsequent flooding. Likewise, during the Operation phase, possible flooding may affect equipment and infrastructure located in the low areas of the hospital, thus disrupting its normal operation. Heat waves may lead to increased power consumption for cooling purposes, thus also raising the operating costs.

The Project took different measures to mitigate the potential impacts associated with these events, like: i) the use of interlocking paving in outdoor areas to enable rainwater filtration into the ground, thus avoiding ponding and helping to recharge aquifers; ii) the installation of window and opening

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<sup>6</sup> Opy Health's "Integrity Channel" is a mechanism which can be used by employees, clients, suppliers and third parties to report violations to or suspicions of violations to the Company's code of ethics and conduct anonymously and confidentially. It is handled by a specialized company and is available 24/7 over the phone (0800 881 9235) or on the website: [www.contatoseguro.com.br/pt/opy](http://www.contatoseguro.com.br/pt/opy).

shading systems with metal shading louvers; and iii) the use of construction elements with appropriate thermal transmittance and absorptance for the Palmas region, as established in NBR 15220-3<sup>7</sup>.

On the basis of an analysis performed in accordance with the IDB Group's Paris Alignment Implementation Approach, the Project is deemed aligned with the Paris Agreement, both in terms of mitigation objectives and adaptation.

#### 4.1.d Management Programs

Under constant supervision from the Company, during the Construction phase, the contractor will be responsible for implementing the environmental management, construction waste management, and emergency response plans, as instructed by the local environmental authority and the installation license. For the Operation phase, the Client will develop and implement the corresponding E&S management programs, including the integrated waste management, environmental and energy efficiency, and OHS programs as well as other core environmental programs as established by the local environmental authorities.

#### 4.1.e Organizational Capacity and Competency

At corporate level, the Company has a sustainability manager and an analyst, in charge of strategically managing sustainability matters and monitoring the indicators and goals for the different projects. Each project has assigned local sustainability experts to implement and monitor the E&S management programs.

For the Construction phase, the Project has a health and safety specialist and hires the services of an environmental consulting firm<sup>8</sup> to monitor *in situ* compliance with the environmental programs that are carried out by the construction company.

#### 4.1.f Emergency Preparedness and Response

For the Construction phase, the Project has an emergency response plan, which sets forth: i) the identification and guidelines for different emergency scenarios; ii) procedures to respond to incidents, medical emergencies, environmental emergencies, etc.; iii) the description of the communication channels; iv) the requirements for the emergency response teams; v) details about the required signaling; vi) training and drilling requirements; and vii) responsibility matrices.

The HHME's design complies with the requirements of the Fire Department and includes emergency response and safety infrastructure and equipment, like: i) areas of refuge; ii) emergency lifts; iii) smoke detectors; iv) use of fire-resistant materials; v) fire hydrants; vi) pressurized stairwells; and vii) fire compartmentation zones. For the Operation phase, the Company will prepare and

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<sup>7</sup> Brazilian regulation that establishes the thermal performance of buildings based on Brazilian bioclimatic zoning and construction guidelines for single-family social housing.

<sup>8</sup> Acato Engenharia e Meio Ambiente.

implement a new emergency response plan to consider, among other things, the requirements to mobilize and evacuate people with mobility issues.

#### 4.1.g Monitoring and Review

An external environmental consulting firm checks that the construction company complies with the environmental management programs and requirements. A specialized consultant visits the site every week to confirm the activities are being carried out correctly. Additionally, the Company's health and safety specialist monitors in person compliance and good performance in terms of the health and safety procedures at the worksite.

The construction company submits a monthly monitoring report with health and safety indicators (accidents, incidents, deviations and action plans, campaigns) and environmental indicators (waste, power, water and effluents). Additionally, Opy Health's Sustainability Department monitors the results of the indicators and goals of this and other Company projects.

#### 4.1.h Stakeholder Engagement

At corporate level, Opy Health has mapped its stakeholders to develop a materiality matrix. Some of the identified stakeholders are: employees, shareholders, hospital users, physicians and health professionals, suppliers, local communities, subcontractors, and government authorities, among others.

The Company also carried out a local community study, which assessed the local conditions and buildings in the Project area, and included the identification of associations of local residents. The Company will develop and implement a stakeholder engagement and communications plan that is specific to the Project.

#### 4.1.h.i Disclosure of Information

Opy Health is currently preparing an annual report in which it presents information about its environmental performance, an inventory of greenhouse gases (GHGs), people management, health and safety, as well as volunteering and community engagement actions. The report is submitted in compliance with the guidelines of the Global Reporting Initiative<sup>9</sup> (GRI).

#### 4.1.i External Communication and Grievance Mechanisms

Opy Health's Integrity Channel, which can be accessed through a toll-free hotline or the website, is available to anyone who wishes to file a grievance, report suspicions, or seek clarification about potential breaches of the Company's code of ethics and conduct or its internal policies. The Channel enables filing grievances anonymously and has an associated management policy that prohibits any form of retaliation.

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<sup>9</sup> The Global Reporting Initiative (GRI) is an independent international organization which develops the world's most widely used standards for sustainability reporting, helping companies and governments to communicate their E&S and economic impacts, and environmental social and governance (ESG) performance in a transparent, standardized manner.

The reports filed with the Channel are received through a third party, which guarantees the protection of the identity of all parties involved and prevents conflicts of interest. The calls to the hotline are handled by psychologists, to ensure that those reporting issues receive the treatment and support needed for highly sensible matters, like harassment and discrimination. The Company's Compliance team is responsible for carrying out the investigations and implementing the corrective measures and sanctions, as necessary.

The hospitals operated by the Company rely on a grievance channel which is used for the stakeholders to express their concerns, claims and suggestions. The Company is engaged in these cases, as applicable, as long as the matter raised involves Opy Health in the reported activities.

## **4.2 Labor and Working Conditions**

### **4.2.a Working Conditions and Management of Worker Relationships**

The Project currently engages 9 direct employees working at the Project site, as well as about 111 workers employed by the construction company. A total of 203 third-party workers are expected to be employed at peak construction.

During the Operation phase, the Company will hire and manage workers for administrative and other general services (reception, administrative assistant, cleaning, laundry, maintenance, IT, etc.). The government of the State of Tocantis is responsible for the provision and management of "white-collar" employees, which includes physicians, nurses and other care professionals. The Project will involve a total of about 2,340 workers during the Operation phase.

#### **4.2.a.i Human Resources Policies and Procedures**

Opy Health's general policy of human resources includes guidelines to manage human rights that shall be observed by all Company staff, from corporate to individual projects. The policy establishes: i) procedures and guidelines for the recruitment and selection, hiring and onboarding, and dismissal of workers; ii) internal communication channels; iii) job roles and pay requirements; and iv) performance appraisal procedures; among others.

The Company also has in place some specific policies; for example, a benefits policy, a job roles and pay policy, and a performance appraisal policy, among others.

#### **4.2.a.ii Working Conditions and Terms of Employment**

Company workers are hired following the requirements of Brazil's federal government's Consolidation of Labor Laws (CLT, in Portuguese), which secures certain rights and benefits for workers, like: i) annual leave; ii) the 13th-month salary; and iii) maternity and paternity leave, among others. Opy Health offers additional benefits, such as: i) travel allowance (commute travel); ii) health and dental care plans; iii) meals/supermarket vouchers; and iv) life insurance, among others.

Employees can access the benefits policy as well as the rest of the applicable policies through an online platform; their rights and benefits are also communicated when they are onboarded.

#### 4.2.a.iii Workers' Organizations

Opy Health's human rights policy recognizes and guarantees their employees' right to associate and prohibits any form of discrimination against its members and union representatives.

#### 4.2.a.iv Non-Discrimination and Equal Opportunity

The Company's code of ethics and conduct and its human rights policy express its commitment to respecting diversity and encouraging zero tolerance for any form of discrimination, based on sex, race, origin, color, ethnicity, nationality, religion, marital status, family status, sexual orientation, gender identity, age or physical condition, etc.

#### 4.2.a.v Grievance Mechanism

Program RH+Você provides for the existence of suggestion boxes which workers can use to submit concerns, claims or suggestions anonymously, and offers opportunities to discuss topics that are relevant for the workforce with different teams.

Employees also have access to the Integrity Channel, which they can use to report anonymous grievances. The Channel policy does not tolerate any form of retaliation.

#### 4.2.b Protecting the Workforce

The Company's code of ethics and conduct and its human rights policy prohibit the use of forced or child labor, whether for direct or third-party employees.

#### 4.2.c Occupational Health and Safety

The construction company has in place a risk management program (RMP) which identifies and assesses the occupational risks associated with the Project activities, and defines the actions and measures to prevent and mitigate those risks, including providing personal protection equipment for each activity.

The contractor: i) has its own OHS system and OHS plan which consolidates the RMP, the occupational health medical control program and other related activities, like training sessions and daily safety briefings; ii) employs an occupational health team for the implementation and supervision of the relevant activities; and iii) submits monthly health and safety reports to Opy Health with the main results and activities, and related KPIs.

The Company has an occupational safety specialist who works on the Project site daily monitoring the activities performed by the construction company and compliance with the health and safety requirements.



For the Operation phase, the Client will develop an OHS program for the Project employees, in compliance with Opy Health's health and safety management procedure.

#### 4.2.d Provision for People with Disabilities

Law No. 8213/1991 of the federal government of Brazil determines the minimum number of people with disabilities that must be hired by a Company based on its total workforce<sup>10</sup>. In order to promote diversity and inclusion across its operations, the Company established a corporate goal to hire people with disabilities in amounts larger than the minimum legal requirement.

#### 4.2.e Workers Engaged by Third Parties

The construction company relies on its own environmental, and health and safety management system. The Company checks the environmental and health and safety monthly indicators and has employees daily on site monitoring the Project performance and compliance with the environmental and health and safety requirements.

The Company relies on third-party workers from other regions nearby, who are accommodated in three camps near the Project. The camps are inspected monthly for compliance with the requirements of Regulation 24<sup>11</sup>.

The policy to hire and manage third parties establishes that contractors must observe the guidelines in Opy Health's code of ethics and conduct, and defines the procedures of evaluation, hiring and integrity due diligence.

However, the policy will be updated to reflect the procedures to monitor the environmental, occupational and health and safety requirements for contractors and their workers.

#### 4.2.f Supply Chain

An environmental consulting firm analyzes and monitors the environmental documentation of suppliers of inputs and critical materials, like timber, gravel, clay, sand, and concrete. The Company requires that all timber used produce a Document of Forest Origin (DOF) that guarantees the lawful, sustainable origin of the material.

Despite the above, the Company will prepare a supply chain management program to formalize the procedures needed to check compliance with the environmental and sustainability requirements for the Project's critical materials.

### 4.3 Resource Efficiency and Pollution Prevention

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<sup>10</sup> According to Law No. 8213/1991, companies with 100 employees or more must hire people with disabilities in the proportion of 2% and 5% of their total workforce.

<sup>11</sup> Establishing the hygiene conditions to assure the health and comfort of all workers, with guidelines about standards applicable to facilities like cafeterias, changing rooms, restrooms, and lodgings.

#### 4.3.a Resource Efficiency

As per the letter of the concession agreement entered with the government of Tocantins, Opy Health is not responsible for the operational control, purchase or supply of water and power for the Project. Nonetheless, as it is committed to observing sustainability across its activities, the Company implements several actions to promote reduced consumption and efficient, sustainable use of resources in its projects. In this regard, for the HHME, the Company considers the following actions: i) the installation of a water heating system using solar panels; ii) the use of automated sprinkler or drip irrigation systems for landscape vegetation; iii) the use of LED lamps across the building; and iv) the adoption of a bioclimatic design with a shading system and construction elements that guarantee proper thermal performance.

##### 4.3.a.i Greenhouse Gases

The main sources of GHG emissions associated with the Company's activities are natural gas and liquified petroleum gas (LPG), both used primarily for meal preparation and laundry services.

Opy Health estimates and publishes an inventory of its Scope 1-3 emissions for all its activities. Scope 2 emissions (associated with the purchase of electric power) have traditionally been the most representative in the hospital sector. Nonetheless, as the Company is not responsible for managing the electric power used in its projects, it only considers the emissions from the power consumed in its corporate office.

In 2024, the direct emissions from all Company activities and projects broke down as follows: Scope 1: 875.84 CO<sub>2</sub>e; Scope 2: 2.28 CO<sub>2</sub>e; and Scope 3: 669.07 CO<sub>2</sub>e.

In order to reduce the GHG emissions, the Project will not use CFC- or HCFC-<sup>12</sup>based refrigerants.

##### 4.3.a.ii Water Consumption

The Project does not require high volumes of water, which is mainly used for human consumption and some irrigation activities during the Construction phase. Water is currently sourced from a well located in the Project plot. During the Operation phase, the hospital will be sourced from the public distribution system of the municipality of Palmas.

#### 4.3.b Pollution Prevention

The liquid effluents generated during the Construction phase of the Project are of sanitary origin, from the portable toilets and restrooms installed at the temporary office. The latter are connected to the public sewerage network, while effluents from the portable toilets are temporarily kept in a tank and sent to a licensed wastewater treatment plant, as set out in the effluent management

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<sup>12</sup> CFCs (chlorofluorocarbons) and HCFCs (hydrochlorofluorocarbons) are types of refrigerant gases used in air-conditioning systems, which have been banned due to the damages they cause to the ozone layer.

program. The environmental consulting firm hired by the Company monitors the program is observed and the effluents are disposed of correctly.

The effluents generated during the Operation phase come from the sanitary services, as well as from room and equipment cleaning, instrument sterilization, and catering services. As with water and power consumption, the Company is not responsible for managing and treating the effluents generated by the activities of the HHME or the other projects it operates. However, it monitors the discharge of effluents, considering correct disposal through the public sewerage network's treatment systems, and making sure the associated indicators are consistent with the official parameters for biochemical oxygen demand (BOD) and chemical oxygen demand (COD). The Company also takes preventive actions across its projects; for example: i) the use of automatic dilution systems for concentrated chemicals, which help control cleaning and disinfecting agents into effluents, and ii) the maintenance and cleaning of kitchen grease traps to prevent the discharge of solid waste into the drainage system.

#### 4.3.b.i Waste

The Project has adopted a solid waste management plan following the criteria established by the environmental authority.

Clearing and earthworks were carried out in the early stages of the works, which mainly generated wood waste (branches, logs and various vegetation waste). All the material was transported to the facilities of a third party<sup>13</sup> specialized in organic waste reuse and treatment, which is duly licensed by the relevant environmental agencies.

The main waste created during the Construction phase includes: i) non-hazardous waste, from food scraps and paper, and other office waste; and ii) hazardous waste, especially material contaminated with oil and grease from machine and equipment maintenance activities.

Non-hazardous waste has been properly segregated and disposed of in collection bins provided by the municipal government, to be further collected by the urban waste collection service. Hazardous waste was properly contained and further collected by a specialized, properly licensed third party<sup>14</sup> which transported, treated and properly disposed of it.

As required by the installation license, the third party produces certificates of proper disposal of construction waste every six months.

For the Operation phase, the Company will develop and implement an integrated waste management program which will establish the necessary procedures to properly identify, segregate, stage and dispose of the waste generated by the Project activities, especially medical hazardous waste.

## 4.4 Community Health, Safety, and Security

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<sup>13</sup> Super Humus.

<sup>14</sup> RR Empreendimentos.

#### 4.4.a Community Health, Safety, and Security

In order to prevent and mitigate potential risks of interfering with day-to-day life of the residents in the area where the construction works are taking place, the Project implements different management programs and actions.

Even though there has been no direct intervention to date on the public road system (like lane closures or traffic disruptions), the Project activities generated at this stage a significant increase in traffic of trucks and heavy machinery. As part of the program to mitigate the interferences on the road system, the construction company: i) has put up temporary signs warning about heavy traffic; ii) has provided orientation for the drivers about defensive driving and speed limits; and iii) performs continuous monitoring actions with local health and safety teams. The emergency response plan for the Construction phase also considers communications and response for the victims of accidents or incidents caused by the movement of machinery or equipment.

The activities performed to date during the Construction phase have not generated significant levels of noise and vibrations. However, a noise and vibration control program is expected to be implemented for the next construction phases, particularly when involving the use of large equipment and activities that could create noise or vibrations. Also, to mitigate the emissions of particulate matter (dust), the construction company implements regular environmental control measures, such as ground wetting.

The impacts of noise, vibrations and dust generation during the Project operations will drop until they practically disappear, and the impacts on road traffic and system will be mainly associated with the increase in vehicle traffic at the site, including ambulances. The Project will develop and implement a program to mitigate the interferences in the road system and to prevent accidents in this phase.

##### 4.4.a.i Infrastructure and Equipment Design and Safety

The HHME's design complies with the requirements of the Fire Department and includes emergency safety and response infrastructure and equipment, like: i) areas of refuge; ii) emergency lifts; iii) smoke detectors; iv) use of fire-resistant materials; v) fire hydrants; vi) pressurized stairwells; and vii) fire compartmentation zones.

As a way to guarantee the ongoing compliance with life & fire safety (L&SF) requirements, the Company will hire a consultant to prepare an L&FS masterplan and to certify that the Project is in compliance with the L&FS provisions of the World Bank Group's Environmental, Health, and Safety Guidelines (ESH Guidelines).

It is worth mentioning that in order to ensure the health and safety of the HHME's users and workers, the Company prohibits the use of paints containing lead or cadmium.

##### 4.4.a.ii Community Exposure to Disease

Brazilian Law No. 9431/1997 establishes that all hospitals must have a hospital-acquired infections control program (HICP), aimed at preventing, reducing risks of and controlling healthcare-associated infections (HAIs), with safety protocols that must be included in the patient care procedures and routines, and support services; the implementation of engineering controls, like the installation of air handling units (AHUs); the adoption of isolation procedures; and epidemiologic surveillance to detect cases of HAIs. The HICP will be implemented by health professionals from the HHME.

#### 4.4.a.iii Emergency Preparedness and Response

During the Construction phase, the Client developed an emergency and fire safety plan, approved by the Tocantins Military Fire Brigade. The emergency response plan involved identifying scenarios and procedures of response to incidents, accidents, medical emergencies, environmental emergencies, fires, etc.

For the Operation phase, the Company will prepare and implement a new emergency response plan to consider, among other things, the requirements to mobilize and evacuate people with mobility issues, in compliance with the L&FS provisions in the ESH Guidelines.

#### 4.4.b Security Personnel

During the Construction and Operation phases, the Project will have private security services provided by a specialized third party. The teams do not carry arms, but are trained in the use of force, humane treatment and respect for human rights. However, the Company will develop a private security management program, which will establish the requirements and training for the private security teams.

### 4.5 Land Acquisition and Involuntary Resettlement

The Project, which is being developed on a plot granted by Tocantins municipal government, will result in no physical or economic displacement.

### 4.6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

#### 4.6.a General Requirements

The Project is located in the Cerrado area, the second largest biome in Brazil, which comprises, apart from Tocantins, the states of Goiás, the Federal District and part of states of Bahia, Ceará, Maranhão, Mato Grosso, Mato Grosso do Sul, Minas Gerais, Piauí, Rondônia and São Paulo.

The EIA involved surveying the flora and fauna in the Project area of influence, and identified: i) 33 flora species; and ii) 10 mammal species, 84 bird species and 7 species of herpetofauna.

In terms of fauna, the presence of the giant anteater (*Myrmecophaga tridactyla*), a vulnerable species for Brazil's Ministry of Environment<sup>15</sup>, and the eyra-cat (*Herpailurus yagouarundi*), a species

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<sup>15</sup> MMA Ordinance No. 148/2022.

considered of ecological relevance due to its role as a predator helping control populations of smaller prey and maintain ecological balance were found. No migrant or threatened species have been identified.

#### 4.6.b Protection and Conservation of Biodiversity

The construction and development of the Project required vegetation clearance and earthworks. The Municipal Environmental Foundation of Palmas issued an environmental clearing license under the compensatory condition that materials for the Foundation's Forest Garden seedling nursery shall be purchased.

During the vegetation clearance activities, the construction company implemented a wildlife deterrence and rescue program. The activities were carried out by a specialized technical team, and the clearing machine operators were trained in the program procedures, assuring the adoption of good practices focusing on minimizing the impacts on wildlife. Rescues were carried out with the support of the Metropolitan Guard, and wild animals were taken to the Tocantins Nature Institute (NATURATINS).

No risks associated with the local fauna have been identified in connection with the subsequent Project activities (site clearing and grading). Nonetheless, the program remains active, and the workers engaged in the construction activities are trained in good practices of protection and preservation of local fauna.

#### 4.7 Indigenous People

The Company operates in urban areas and will not affect any indigenous communities.

#### 4.8 Cultural Heritage

The Company is not located in any area with real or potential cultural heritage and, therefore, it will not affect cultural heritage.

### 5. Local Access to Project Documentation

The documentation relating to the Project can be accessed at the following link: <https://opyhealth.com.br>.