POMERA
MADERAS

Forest Management Plan
Paraná 3

Adjusted version of the Garruchos Group Management Plan v3.14 for the project Mixed Afforestation in the Parana Basin III -VCS ID 5202

Version: V 1.0

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SUMMARY

- In northern Argentina, a total of 1,789.62 hectares of previously degraded land was restored by establishing permanent forests in the Department of Santo Tomé, Province of Corrientes, about 30 km from the city of Santo Tomé.
- Project Start Date: 30/06/2023
- VERRA ID: 5202 https://registry.verra.org/app/projectDetail/VCS/5202
- Project name: Mixed Afforestation in the Parana Basin III (Paraná 3)
- Methodology: VM0047-Afforestation, Reforestation and Revegetation

SPECIES:	42,7% Pino 42% Eucalyptus 15,3% Nativas
NATIVE SPECIES:	20
TOTAL CARBON REMOVALS	1,979,900 tCO_2
CONSERVATION AREAS	40.6 ha

- Management: Plantations in accordance with FSC® principles and criteria, SGSCH-FM/COC 002791 code, FSC C016482 trademark® license.

THIS MANAGEMENT PLAN ADAPTED FOR THE PARANÁ 3 PROJECT DOES NOT CONTEMPLATE PRUNING, THINNING, FELLING OR ANY OTHER TYPE OF TIMBER FOREST USE.

1 GENERAL INFORMATION

Cambium Earth SL, a company incorporated in Spain in 2023, whose objective is the development of forestry projects on degraded soils for the removal of atmospheric carbon dioxide (CO_2) and the obtaining of high-quality carbon credits for voluntary emission compensation markets.

For the implementation of these projects in Argentina, Cambium Earth has **Pomera Maderas (Garruchos S.A.),** both companies are part of the INSUD business group, managed under the same unit and management policy.

Garruchos S.A. has decades of experience in forest management, and its operations are located in the north of the province of Corrientes and south of Misiones. It produces, processes and markets its solid wood products mainly from Pinus sp. and Eucalyptus sp. in the national and international market. It is characterized by its innovation in producing non-traditional broadleaved species among its forest heritage of Pinus sp. and Ecualyptus sp.

As of 2022, Garruchos S.A. began its new career in the implementation of carbon removal projects through afforestation, reforestation and revegetation projects for the voluntary carbon markets.

High-yielding, high-yielding afforestation are managed while preserving all environmental factors, the S&H of all its personnel, its service providers, and the neighboring community.

More than 20% of its land is destined to the conservation of representative environments such as natural grasslands, palm groves, natural riparian forests and native forests. Hunting, fishing and timber extraction activities, such as the entry of unauthorized persons, are restricted.

The company has an annual production of 4 million seedlings in its forest nursery of high-quality genetic material. It has developed a Eucalyptus genetic improvement program for 16 years with the aim of producing solid wood, poles and biomass, seeking to improve the quality of the wood and production.

Garruchos has support sectors in the areas of human resources, administration, finance, marketing and sales.

All activities and their environment are monitored during the forest cycle, which allows continuous improvements to be made.

Garruchos shares FSC's® vision that the world's forests meet the social, ecological and economic needs and rights of present generations without jeopardizing those of future generations. This means that Garruchos' forest management is environmentally appropriate, socially beneficial, economically viable, and assures its customers that the wood they buy comes from responsibly managed forestation. For these reasons, the forestations and the industrial plant are certified by the FSC® international standards for responsible forest management, as well as the control of the entire value chain of their products, from the forest to their final delivery to their customers. It has a Group Forest Management and Chain of Custody certificate represented by Garruchos S.A. since 2006 under the code SGSCH-FM/COC 002791 and FSC® C016482 License.

2 COMPANY BACKGROUND

GARRUCHOS began its forestry activities in April 2004, with the purchase of the companies **GARRUCHOS SA** and **ESTRELLA DEL BOSQUE SA** that owned forests planted in the province of Corrientes, Argentina. In February 2005, he bought the sawmill **MULTIMADERAS S.A.** located in the town of Governor Virasoro, province of Corrientes, on National Route 14, km 759, San Alonso area.

From the time the company took possession of the assets and the decision to review the forestry business as a whole, analyzing both the strengths and weaknesses of the company, as well as opportunities and threats in the sector, it has become clear that the acquisition of the forested area allows it to foresee an interesting development horizon.

Under this concept, it is decided to implement the increase of the area forested with pines, as well as an internal reorganization of the Company, in order to balance the expenses with the income of the business, visualizing that the opportunity to have some own Industry that will generate greater business opportunities.

On January 1st , 2008, the companies GARRUCHOS SA, ESTRELLA DEL BOSQUE SA and MULTIMADERAS SA merged under the name GARRUCHOS S.A.

In September 2008, the shareholders of GARRUCHOS SA bought 100% of the shares of the company FORESTAL AGUARA CUA SA. and incorporated them into its management.

In April 2010, the field belonging to the company ARRO FORESTAL was purchased and its surface was incorporated into the management of the Garruchos field.

Continuing with its investment plan, in June 2011 the assets of the company Danzer Forestation were acquired with an area of 14,232.98 hectares, distributed in fields located in the Departments. of San Ignacio, Lib. General San Martin and Capital in the province of Misiones, and in the Department of Ituzaingó, Corrientes.

In this way, these fields are constituted in a new productive unit of Garruchos, and the fields acquired from the former Danzer Forestación S.A. are renamed GARRUCHOS FORESTACION S.A.

During 2008 and due to the current and future situation of the forestry sector in the North of Corrientes and South of Misiones, the objective of the company was reevaluated and the plantation policy of the main species was changed, which became Eucalyptus sp., maintaining the firm commitment to conserve the natural ecosystems that house flora and fauna. on the premises of GARRUCHOS S.A., of FORESTAL AGUARÁ CUA S.A. and GARRUCHOS FORESTACION SA.

Garruchos produces and markets forest products of Pinus sp., Eucalyptus sp., Toona sp., Melia sp., and Grevillea sp. among other species. Its destinations are the National and International Market.

Since 2022, Garruchos has been actively involved in the implementation of long-term carbon projects, based on afforestation without harvesting, in the Garruchos, Puerto Valle, and Loma Verde farms.

3 VISION, MISSIONS, VALUES, POLICY

VISION

To be a leading company in the forestry-industrial field, recognized nationally and internationally for its sustainable production of solid wood, excellent services and innovative spirit.

MISSION

To produce quality forestry-industrial products and provide services of excellence, aimed at generating value for our shareholders, customers, suppliers, collaborators and for the community in which we carry out our activities.

VALUES AND PRINCIPLES

› Ethics and commitment: we seek to carry out our business by establishing fair and transparent relationships with the people who work around our organization. We dedicate ourselves to our work in a framework of honesty, professionalism and coherence.

› Participation and teamwork: We believe that the best way to achieve a common goal is to encourage participation, cooperation and teamwork. We motivate and train our employees to promote their professional development.

› Respect for the environment, safety and health: We strive to make rational use of natural resources, preserve the environment and biodiversity, without compromising the future of future generations. We consider it a priority to follow the highest safety standards in all our activities, in order to preserve the integrity of our employees and the community as a whole.

› Continuous improvement: we constantly face new challenges and work to continuously improve our management, quality and production systems, in search of excellence. We have a concern to perform better.

› Customer orientation: based on mutual trust, our actions are aimed at knowing the needs of our customers and meeting their requirements, ensuring quality products and efficient service.

POLITICS

Garruchos S.A., legal authority of the group entity**, FSC® Forest Management Group,** licenses the use of the FSC® C016482 brand**,** assumes the commitment to preserve the safety and health of its personnel, contractors, neighboring communities and to take care of the environment in which it develops its industrial forestry activities, from the implementation of its forests. to the commercialization of its finished products.
For this reason, its Management considers this policy as an integral part of its business and a priority throughout the management line, ensuring its dissemination, understanding and compliance at all levels of the Organization.

To this end, it declares:

1. Comply with all applicable legislation, requirements agreed with Stakeholders, and any other commitments voluntarily assumed.
2. Implement Management Systems that ensure compliance with this Policy and that include programs for:

- Pollution prevention.
- Reduction of occupational risks and improvement of work environments.
- Continuous improvement of your performance.

3. Promote the Health and Quality of Life of its employees.
4. Evaluate the environmental impacts and risks to Occupational Health and Safety in the new projects, investments and businesses that it undertakes.
5. Establish, within the framework of this Policy, Objectives, Improvement and Goals measured within its Management Programs.
6. Ensure that all employees and contractors receive appropriate training and are competent to fulfill their obligations and responsibilities.
7. Provide the necessary resources for compliance with this Policy and the established Objectives.

4 OBJECTIVES OF GARRUCHOS

4.1 GENERAL OBJECTIVE

Garruchos' objective is to responsibly manage its forest heritage in accordance with its Environmental Principles and Policy on Occupational Health and Safety; and the FSC® Principles, Criteria and Indicators of quality and sell these plantation-derived products at the best possible price to the market.

4.2 FOREST MANAGEMENT OBJECTIVES

1. Sustainably manage forest assets in accordance with the Environmental Principles and Policy on Occupational Health and Safety.
2. To provide raw material of eucalyptus, pine and other species to the market in a sustained manner.
3. To provide raw material of species of higher value, destined for the appearance market.
4. Produce quality raw material.
5. Sell products at the best possible price.
6. Supply poles to the impregnating plant.
7. CO_2 removal in afforestation

4.3 ENVIRONMENTAL OBJECTIVES

1. Evaluate, reduce and monitor the environmental impacts of operations on environmental factors: water, soil, fauna, flora.
2. Protect and monitor rare, threatened, endangered species, their habitats.
3. Protect and monitor representative samples of existing ecosystems and enhance their ecological functions.
4. Manage in an environmentally appropriate manner waste from fuels and lubricants, chemicals, containers, liquid and solid inorganic waste.
5. Control and monitor the dispersal of exotic species planted outside the areas destined for plantation (Lots).
6. Evaluate, maintain, improve and monitor the presence of attributes of high environmental conservation value.
7. Contribute to mitigating the effects of climate change through CO_2 removal with afforestation.

4.4 SOCIAL OBJECTIVES

1. Provide employment, training, and other service opportunities to communities within or adjacent to forest management areas,
2. Comply with and/or exceed laws and/or regulations applicable to the health and safety of employees and their families.
3. Guarantee the rights of workers to organize and voluntarily negotiate with their managers in accordance with Conventions 87 and 98 of the International Labor Organization.
4. Incorporate the results of social impact assessments into management planning and implementation. Consult the populations and groups directly affected by the management operations.
5. Employ appropriate mechanisms to resolve claims and to provide reasonable compensation in the event of loss or damage affecting the legal or customary rights, property, resources, or lives of local populations. Take steps to prevent such loss or damage.

4.5 PARANÁ 3 CARBON PROJECT MAIN OBJECTIVES

1. Implement an afforestation plan on 1.789,62 hectares, using mainly Pine (42,7%) and Eucalyptus (42%) species, and incorporating 15,3% of native species to promote ecological diversity, and improve the experience in cultivating these species, which are of growing importance in future ARR projects.
2. Develop the VCS 5202 project activity managed by Cambium in the Department of Santo Tomé, Province of Corrientes.
3. Convert areas historically destined for extensive livestock farming into afforestation areas without harvesting, promoting long-term sustainable land use.
4. Contribute to environmental protection and restoration, minimizing soil erosion and recovering areas degraded by continuous livestock activity.
5. Generate climate benefits, with an estimated removal of 1,979,900 tCO_2 over a 43-year period.
6. Contribute to the Sustainable Development Goals (SDGs), specifically:
    - SDG 2: Zero Hunger
    - SDG 3: Good health and well-being
    - SDG 4: Quality education
    - SDG 5: Gender equality
    - SDG 6: Clean water and sanitation
    - SDG 8: Decent work and economic growth
    - SDG 11: Sustainable cities and communities
    - SDG 13: Climate action
    - SDG 15: Life on Land

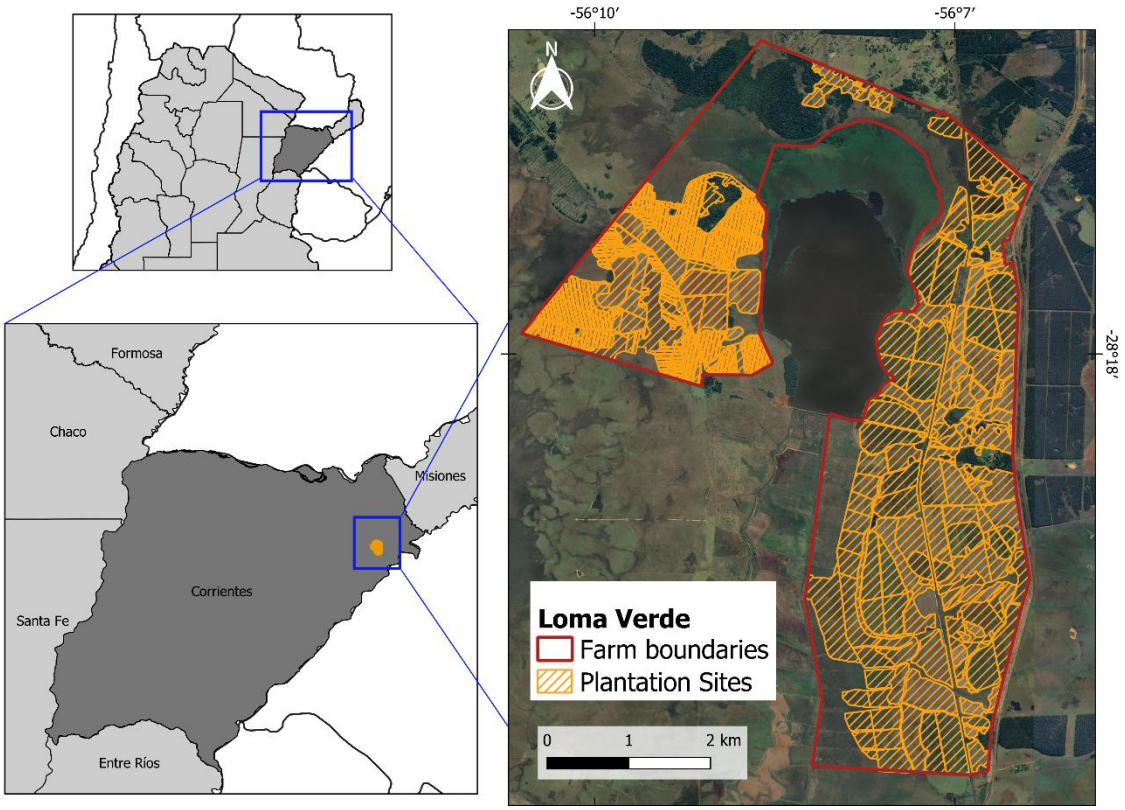
5 FOREST HERITAGE

5.1 LOCATION

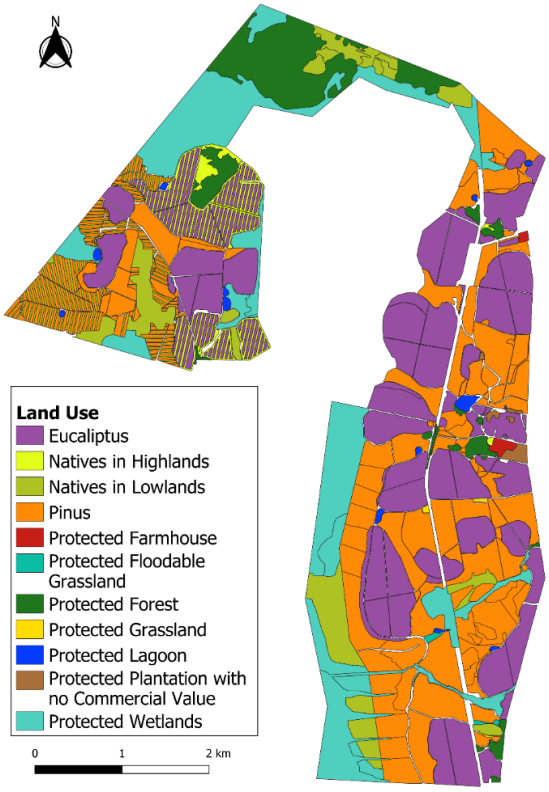
The Project is located in northeast Argentina, in Santo Tomé Department, Corrientes Province, approximately 30 km from Santo Tomé city (28°18'45.44"S 56°6'27.80"O) . The farm boundaries reach 2,531 hectares, total surface of Loma Verde property, private land owned by the implementing partner.

The project area is located within the ecological region of “Campos y Malezales” (“Fields and Scrublands”). This Argentine Ecoregion occupies almost 26,020 km^2, in the Northeast and Southwest of Corrientes and Misiones Provinces, respectively

Map 1: Location of properties



6 SPECIES DISTRIBUTION



7 RESEARCH AND DEVELOPMENT

The Research and Development area, through its Genetic Improvement program, is a fundamental tool for the generation of information and new technologies that are used for silvicultural management and the establishment of forest plantations. Between 1998 and 2001, the foundations of the Eucalyptus genetic improvement program were established, which today has its second generation in the field. The result of this work was the launch of four commercial clones of its own. They stand out for their exceptional characteristics for the production of solid wood and their extreme adaptability to various environmental situations. In addition, eight commercial clones with exclusive licenses are multiplied.

The advances achieved in R+D are included in the forest management plan established by the company, in such a way as to maximize the growth and production of the plantations, achieving high quality products. It is a continuous and long-term process that includes the establishment of field trials under controlled situations to ensure good selection. These trials require periodic monitoring to generate information on new materials that will potentially be included in planting plans. The selection procedure includes strict physical-mechanical studies of the wood, which allow defining the selection of the best material for each situation as well as evaluations of growth in volume, tolerance to cold, resistance to diseases, industrial performance, etc.

For more than 6 years, the company has been selecting superior genetic materials basically in *Eucalyptus grandis*. During 2008 and 2009, tests have been carried out with more than 450 superior individuals, evaluating the volume, shape of the stem, health, type of branches, resistance to frost, biomass production. The selection has been carried

out in the Base Populations of *E. grandis* and in commercial plantations that the company has. To continue with the generation of new higher families, an annual program of inter- and intra-specific controlled crosses is carried out, which is the starting point for the selection of new clones that will be transferred to the clonal development program.

8 FOREST NURSERY

The nursery is located in Puerto Valle and has an annual production capacity of around 4,000,000 seedlings.

It is mainly oriented to the clonal production of Eucalyptus with an annual production of about 2,000,000 seedlings. The rest of the production is divided into eucalyptus from seeds, seminal pine and native species. The genera that are part of the production program are Eucalyptus and Pinus. Within the nursery in Puerto Valle, native plants are produced to be used in the rehabilitation of degraded environments, donations to schools and neighboring communities. Seedlings of native species such as Lapacho (*Handroanthus heptaphyllus*), Cañafistola (*Peltophorum dubium*) or Timbó (*Enterolobium contorticsiliquum*) are produced.

100% of the plants were produced in containers, tubes, or plastic trays. The production of clonal eucalyptus in plastic tubes was replaced by biodegradable, cellulose-based, FSC-certified® tubes. This improves seedling quality, reduces the volume of plastic waste, and lowers the risk of contamination.

Approximately 70% of the production is carried out to meet the company's own demand, while the surplus 30% is marketed to third parties.

All seedlings are of high genetic quality and certified by both INASE (National Seed Institute) and SENASA.

The nursery has around 25 people dedicated to the production of forest seedlings. Production is continuous throughout the year.

In no case is it genetically modified material according to the terms and definitions of the FSC®.

9 CARBON PROJECT

The tasks of controlling weeds, fires and ants will follow the same procedures as a traditional afforestation.

The fertilization of Eucalyptus and native plants will follow traditional fertilization procedures.

Silvicultural management activities such as pruning, thinning or harvesting will not be carried out, thus ensuring that tree individuals develop freely, as well as allowing the natural establishment of native species under the canopy.

Risk control measures (fire, pests, etc.) will be carried out in the same way as in the rest of the Garruchos projects.

10 PLANNING

Through forest planning, Garruchos organizes heritage management from a sustainable and multifunctional perspective. It is projected in the medium/long term through

planning, the tasks and procedures necessary to achieve production objectives in the short, medium and long term are organized. Resources are maximized and costs are reduced. The impact on the environment and the neighboring community is minimized.

The design of plantations is planned in such a way as to promote the protection and conservation of natural ecosystems, and not to increase pressures on them. In this sense, representative areas of native forests, protective forests of watercourses, wildlife corridors, grasslands, watercourses and water bodies are destined for conservation, respecting the regulations that regulate them, such as protection and safety distances, and other provisions in relation to the subject.

The strata are designed considering the distances from plantations to conservation areas and in accordance with current legislation.

Forest roads are planned considering accessibility to stands, heritage protection, minimum possible slope, type of soil, respecting distances to protection areas and minimizing landscape fragmentation.

A geographic information system is used that allows the cartography to be kept updated with the location of stands, road network, watercourses, protection zones, neighboring localities, neighboring productive establishments, health centers, towers detection of fire outbreaks.

11 FORESTRY

Silvicultural treatments are aimed at the establishment and management of plantations with good health status. Treatments start from soil preparation, planting, weed and ant controls.

11.1 LAND PREPARATION

The preparation of the land is carried out in order to provide the conditions in the soil to favor the initial establishment of the plantation, its growth, and future development. Favoring root development, improving water and nutrient retention conditions, controlling weeds, and facilitating ant control are other conditions that are provided with proper soil preparation. Depending on the characteristics of the site, type of soil, and previous use, different types of preparation will correspond.

Areas intended for planting land preparation are stands/lots that come from livestock use These areas may not only have had a different productive use history but may also have different topographic and site characteristics. For these reasons, different methodologies and guidelines are required for field preparation. The sites are classified as hill, high hill with clear-cutting, low and low sandy.

The ploughing of the soil with subsoiling and harrowing is carried out only on the planting line, minimizing its movement and alteration. The purpose of this task is to cultivate the future planting line and mitigate the effect of soil compaction. The subsoiling operation is carried out with the soil at the field capacity and under no circumstances will it be carried out in rainy weather or with soil saturated with moisture. Mechanized preparation work, which is carried out with low soil moisture, prevents compaction. In places with slopes such as hills, the preparation of the land is made perpendicular to the main slope, in order to avoid possible water erosion of the soil after intense rainfall.

All waste from soil preparation is properly managed in order to avoid contamination of soil, water, and/or affect biodiversity. In this stage, special residues derived from hydrocarbons can be generated from the use of machines and implements, as well as derivatives of phytosanitary products used for pest and weed controls prior to planting.

In all cases, one to two pre-planting controls of leafcutter ants (*Acromyrmex* spp. *Atta* spp.) always trying to use the least number of products and adequate weed control.

11.2 PLANTATION

The planting of the selected species of pine, eucalyptus and natives is carried out within the previously authorized stands. The planting methodology can be manual or mechanized. Manual planting is carried out using the gel planting gun as a tool.

Plantations for carbon projects are established with a greater diversity of species and offspring, with higher densities compared to those planted for timber production: between 625 and 1200 trees per hectare and a separation of 4 meters between them, and are managed without thinning, which maximizes the potential for long-term carbon storage.

In the mixture with native species, the two exotic species (Pine and Eucalyptus) can be used as facilitators of the transition thanks to the nurse effect described in the scientific literature, improving the initial environmental conditions of these ancient lands dedicated to livestock.

The seedlings come from our own nursery in biodegradable tubes. In general, post-planting irrigation is not carried out, but in the case of eucalyptus, if the genetic value of the seedling is important, irrigation is carried out to complement the action of the forest gel.

In eucalyptus plantations, fertilization is carried out with nitrogen, phosphorus and potassium NPK+ micronutrients, approximately 120 gr/plant. In order to make efficient use of the fertilizer and avoid contamination of the soil, water and washing of the fertilizer, it is applied in a targeted way to the plant and with granulated product.

Planting is carried out at two times of the year, spring and autumn, where the climatic conditions are favorable for the development of the plant.

11.3 WEED CONTROL

Pasture controls are carried out during the first 18 to 24 months in the case of eucalyptus and natives, and 30 to 36 months in the case of pine and after these controls, cattle enter. None of the control methods are performed under high humidity conditions. In this way, the potential impact that this aspect could have on watercourses and soil is reduced.

Pre-planting weed control

Pre-planting weed controls are carried out, after soil preparation. This control is chemical and the application is mechanized with a tractor and sprayer. In exceptional cases where the terrain is difficult for the tractor to navigate, manual control with a backpack is used.

Post-planting weed control:

Post-planting controls are carried out once the planting has been carried out and in a directed manner on the line and between lines. A combination of chemical and mechanical controls is made. Once the vegetation canopy of the specimens planted on the area between the lines is closed, it is suspended.

11.4 ANT CONTROL

Pest control seeks to keep the population level of the main forest pests below the level of economic damage. The control strategy is based on a set of measures that in an integrated manner allow damage levels to be sustained below the NDE. The measures are intended to have a low impact on the environment and represent a low risk for forestry operators and neighboring local communities. The main pest is the cutter ant. Ant controls are carried out only with products allowed by SENASA, and with those that are not on the FSC prohibited list, according to the provisions *of FSC-POL-30-001a FSC List of Highly Hazardous Pesticides*. The minimum use of products is a commitment, such as their replacement with alternatives with less socio-environmental impact whenever feasible.

Post-Planting Pest Control:

It is about the fight against insects and other pests that could harm the plantations.

The main pest is considered to be the cutter ant, and control is carried out on the pre- and post-planting populations that may persist, as well as other insects if necessary. The controls are chemical through the use of permitted products. In order to reduce the use of chemicals and minimize the impact on the environment, all controls are carried out in a targeted manner at the anthill and at the optimal time. Another tool used for this purpose is the planning of the optimal moment of control. Garruchos S.A. provides economic and technical resources in conjunction with other companies and scientific organizations of recognition such as INTA, APF, in order to seek alternative methods and biological control.

The handling, storage, application and final disposal of phytosanitary products is carried out in accordance with the *"Program for the Responsible Management of Agrochemicals",* see PO 003 and according to the systems, methodologies and frequencies of application indicated in OP 012 Land preparation and planting. The purpose is to achieve effective control, and to avoid, reduce and mitigate possible impacts on the environment and the risk to forestry workers who perform these tasks and neighboring communities.

Control moment

Periodic controls are carried out in a concentrated manner from year 1 of planting to year 2. In the following years, it is monitored sporadically and only when there is evidence of attack.

The most effective time for control is in spring, before the queen's flight. Therefore, this time is chosen whenever possible, as it avoids the formation of new nests and consequently reduces the use of product and impact on the environment.

It is not controlled by rain or high humidity. At least 45 days must pass between one control and another, to avoid not rejecting the product. All controls are directed. The existence of an anthill is sufficient for ant control to be carried out.

Table 1 EUCALYPTUS, PINE, NATIVE PLOTS

Stratum	Species	Plantation density (trees/ha)	Plantation Period			Total Surface (hectares)	
			2023	2024	2025		
1	*Eucalyptus grandis*	833	Jun-Dec 2023			532.86	750.89
2	*Eucalyptus grandis*	833		Jan-Dec 2024		218.03	
3	*Pinus hybrid*	833	Jan-Nov 2023			227.16	764.38
4	*Pinus hybrid*	833		Jan-Nov 2024		230.30	
5	*Pinus hybrid*	833			Jan-Nov 2025	306.92	
6	Natives Mix highlands	1250		Jul-Dec 2024		72.37	274.35
7	Natives Mix lowlands	833		Jul-Dec 2024		28.01	
8	Natives Mix lowlands	1250		Jul-Dec 2024		19.33	
9	Natives Mix lowlands	833			Jan-Nov 2025	135.90	
10	Natives Mix lowlands	1250			Jan-Nov 2025	18.74	

12 USE OF PHYTOSANITARIES

The phytosanitary products used in pine and eucalyptus plantations are those allowed by Argentine legislation (SENASA), and those that are not on the list of prohibited by FSC, according to the provisions of *FSC-POL-30-001a FSC List of Highly Hazardous Pesticides*. Garruchos is committed to the minimum use of products, such as replacing them with alternatives with less socio-environmental impact whenever feasible. It is verified that none of the active ingredients used are included in the IA and IB classification according to the World Health Organization, nor are they formulated based on chlorinated hydrocarbons. The pesticides used are not classified as highly persistent, highly toxic, nor do they have biologically active derivatives, nor do they accumulate in the food chain.
All products are used under controlled situations of purchase, storage, dispatch, application and final disposal of the containers. The forestry workers who are in contact with them are trained and trained personnel, who use personal protective equipment.

All field and nursery applications are carried out in accordance with operating procedures to reduce risks to occupational health and safety and the forest environment, using Logger and tractor-mounted hydraulic cranes.

12.1 CONTROL OF INVASIVE FOREIGN SPECIES

It is managed in accordance with the "Invasive Exotic Control Plan". The control strategy is based on preventive and corrective measures. When non-native species are dispersed outside the project area, control techniques can be manual or mechanized, depending on the size and abundance of the specimens.

13 HERITAGE PROTECTION

13.1 FIRE PREVENTION

Fires are one of the main threats to forestry activity. The use of fire for the renewal of pastures is a very common cultural practice in the area, and it is not always carried out with the necessary precautions to prevent it from getting out of control. Also, activities that involve the movement of people and equipment induce an increase in fire risks, which results in greater consequences as the crop acquires greater size (fuel mass) and economic value. Information from the Fire Management Consortium mentions that 95% of forest fires are of anthropic origin, so it is essential that a forestry company has a rapid detection and combat system, with trained personnel, with adequate equipment and tools and an updated communication system, to take care of its heritage.

Garruchos has an Operating Procedure that establishes the Heritage Protection Plan. It details the objectives and scope, establishes the responsibilities to control the operation, and provides the human and material resources necessary for the operation of the Fire Detection and Fighting System. The procedures establish prevention measures, establish the roles and responsibilities at different levels of decision-making and provide guidelines for the operation of the System; in addition, the role of fire and the structure of prevention and combat at the company level are established. The fire prevention and fighting structure for the establishments in each Zone is presented below.

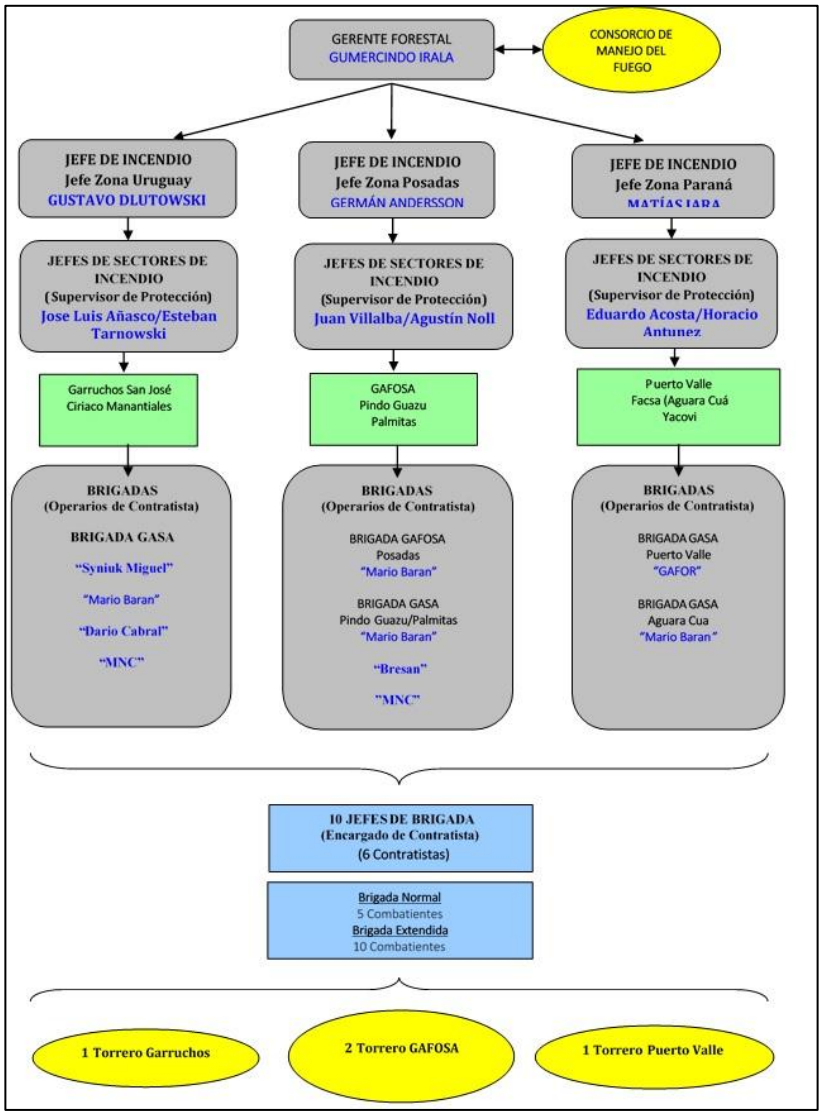


Figure 1: fire prevention and fighting structure

Prevention is carried out in the plantations, by removing the vegetation cover from the surrounding areas. The cutting or elimination of the same is promoted in spaces called firebreaks, which border the stands and prevent the spread of fire in the event of fire. These generally coincide with the route of the roads, power lines, limits with the cattle fields of the neighbors, lowlands and estuaries and other places. As part of the prevention activities, there is also the training of personnel for the treatment of emergencies, which is carried out at the level of a regional consortium with the participation of various local forestry companies (Fire Management Consortium).

Prevention efforts are supported by information provided by a satellite monitoring service, as well as detection work carried out by observation and surveillance towers to identify regional fire hotspots, and the human and material resources needed to carry out firefighting tasks (firefighters). The equipment is made up of large capacity water tanks (more than 10,000 liters) distributed in strategic places of the properties, from which this element can be extracted in case the loading and recharging of firefighting equipment is

required. There are also manual combat tools, and the corresponding personal protection elements.

Each forestry center has a fire brigade made up of a crew of five trained people and their equipment. The brigade performs normal functions during the time of low IRI. During weekends in critical periods, it performs fire guards.

13.2 FIRE CONTROL

This activity is carried out eventually, when fire outbreaks of different magnitudes are detected.

In this act, trained human resources and infrastructure for firefighting are put into operation.

This implies the unusual movement of 4x4 vehicles transporting small portable firefighting equipment, hydrant trucks and numerous people from the company prepared for this purpose and external collaborators (Consortium, Firefighters, others).

This equipment must be supplied through pre-established storage tanks and water intake points, discharging its contents at fire sites. See PO 007, *Heritage Protection Plan*.

13.2.1 Forest Fire Fighting

The actions to be taken to fight each forest fire are decided by the Fire Chief and will depend, in each case, on the characteristics of the fire, the conditions of the affected area, and the prevailing weather conditions.

13.2.2 Operation of the ILLEGAL ACTIVITY AND FIRE DETECTION System:

Illegal Activities

a) Prevention

• Access control: maintain gates, fences, and barriers in good condition; keep a record of vehicles and people entering and leaving the premises.

• Visible signage: post signs saying “Hunting, fishing, and removal of native flora prohibited” at entrances and strategic points.

• Awareness and training: inform all staff and contractors about the prohibition of illegal activities and reporting procedures.

• Patrols and field surveys: schedule periodic inspections in high-risk areas (roadside areas, waterways, areas of high conservation value).

• External partnerships: coordinate preventive actions with local security forces and environmental agencies.

b) Detection

• Direct observation: during patrols by supervisors, brigade members, contractors, or operational personnel, detect signs such as traps, cartridges, remains of campfires, footprints, or felling of native trees.

• Community monitoring: encourage communication with neighbors and nearby communities so that they report suspicious movements.

• Internal reports: establish a rapid communication channel (telephone, radio, app) to report findings to the Supervisor or Area Manager.

• Recording and documentation: record each incident detected (date, location, people, signs) on the corresponding form, ensuring the traceability of the information.

C) Immediate action upon detection

1. Notify the Supervisor or Area Manager.
2. Notify the Forest Manager.
3. Contact the police or competent authority.
4. Document the incident with photographs or written records.
5. Request the immediate removal of the persons involved, preserving the safety of staff.

Forest fires or potential forest fires.

Detection using ground equipment and watchtowers:

There is a total of six observation towers to detect columns of smoke that may correspond to potential fire outbreaks, one in Garruchos, another in Puerto Valle, three in Posadas, and one in San Ignacio. All the towers are integrated with eleven others belonging to CMF associations and are strategically distributed to cover the entire forested area in the zone, including the Garruchos, Ciriaco, Manantiales, and San José establishments, as well as El Porvenir and San Ignacio in Misiones. The Puerto Valle tower covers that field. Pindó Guazú and Palmitas are covered by the Campo Rincón and Itaembe towers.

The Virasoro Center is covered by the Fire Management Consortium's detection area.

All towers are equipped with alidades, which consist of a graduated plate and a movable needle that allows the direction in which the detected smoke column is observed to be indicated with an accuracy of plus or minus 1 (one) sexagesimal degree. They are operated by contractor personnel, equipped with radios for communication and binoculars.

The “Torrero” is responsible for communicating each and every smoke column detected to the C.M.F. headquarters, which, in conjunction with the rest of the towers, will perform a panel cut to determine the spatial location of these columns more accurately.

Whenever smoke is reported from the tower, it is transmitted to the C.M.F. headquarters, where personnel are permanently on duty to receive the information at the operations center and complete a daily observation report form from the towers, which will serve as a record and follow-up of the detected sources.

Another way in which a probable fire source can be detected is through information provided by our own staff and contractors, passers-by, or neighbors in the area.

The communication of data and the subsequent coordination of actions is carried out through our own radio frequency, using the company's base and handheld equipment.

Detection using Satellite Early Warning and Artificial Intelligence

The Satellite on Fire system uses satellites and artificial intelligence to detect hot spots, which are thermal signals of a possible fire. We have contracted this service for all our fields. For each field, we have defined a 3 km buffer area around the boundary in order to detect hot spots within the field or in this buffer area. If a hotspot is detected, the system notifies us. This system uses satellites that detect thermal changes, and the analysis is performed with AI to determine the probability that it is a real fire. If the confidence level is high, alerts/notifications are issued via WhatsApp and email, and this notification reaches the forest manager, area managers, and supervisors, allowing us to take quick action.

Procedure in response to the alert/notification

1. When the notification is received via WhatsApp or email, the area manager or supervisor communicates in the WhatsApp group available to everyone, called “FIRE REPORT,” that they have received the notification and what action they will take.

2. The action may be:

- - A direct review to check the location.
- - Sending another contractor.
- - Checking the dome surveillance camera or fire control tower to confirm the detection.

3. Once the situation has been confirmed, the group is informed of the situation to determine whether there is no risk or whether intervention is required.

4. Depending on the situation, actions are coordinated within the same WhatsApp group.

Procedures based on the fire management consortium's report on IRIR (Rural Fire Risk Index)

From MEDIUM IRIR onwards, those responsible for property protection implement a control and check system.

Starting at MEDIUM IRIR, the Fire Sector Chief will organize surveillance and arrange for permanent observation from the towers from 10 a.m. to 6 p.m. Observation from the towers will be suspended only in the event of rain and may be extended for specific risk reasons. During critical periods, the tower hours are extended, both morning and night.

When the IRIR begins at HIGH, the fire chief implements the Passive Guard Schedule to be followed by the sector chiefs and brigade chiefs, who go on alert and take on any firefighting tasks during non-working hours. To this end, the members of the brigade on duty will be warned to remain on alert where they can be easily located.

Any developments during each passive guard duty will be reported by radio and/or telephone by the brigade chief to the corresponding surveillance unit according to the affected area, and then monitored by the sector chief.

When the IRIR is HIGH, the detection and firefighting system goes on high alert, and the firefighting brigades must be ready to respond immediately to any incident. Active "preventive" shifts are also carried out, in which the fire brigade patrols the most critical areas of the site, carrying out light work and equipped with all the rapid response equipment in the vehicle.

On non-working days (Saturdays, Sundays, and holidays), the Fire Chief will implement a system of active guard duty and patrols (to detect hunters, people outside the company, and third-party vehicles), which will have a minimum staff of three people (one driver and two firefighters).

14 ROADS

The productive establishments have an internal road network that allows and facilitates access to the stands in order to carry out silvicultural tasks, heritage protection and conservation.

It is made up of main, secondary and tertiary roads. The main ones remain passable for trucks throughout the year, they are wide enough to allow two transport units to cross in different directions safely. The width is 15 meters. The maximum acceptable gradient is 10% and the maximum driving speed is 50km/h. The secondary roads allow the transit of transport units in both directions with one of these units stopped, have a width of 8 to 9 meters and allow access to all forested areas for fire control. Its use by transport units is restricted by excess humidity in case of rain. They admit a slope of up to 12%.

In order to minimize the density of roads and reduce the impact on the environment, the network is planned considering the route with suitably reduced slopes. The layout of new roads and/or modifications of existing roads is prepared on plani-altimetric cartography if necessary. For more information, see PO 005, *Forest Roads.*

15 ESTIMATION OF FOREST YIELDS

Growth estimates are commonly made by a growth simulator generated by INTA Montecarlo, applicable to the most abundant commercial species.

In turn, the company has tests that allow it to verify the growth that the simulators estimate and under an average of the site qualities and a precautionary forecast the expected average yields.

The evolution of the forest mass is monitored using the inventory technique. To do this, permanent plots are measured and the following variables are determined: diameter at chest height (cm) and total height (m) of all trees within the plot. Measurements of permanent plots are carried out on an annual basis. For more information see *PO 010: Installation and measurement of permanent inventory plots*.

16 ENVIRONMENTAL MANAGEMENT

Garruchos' forest management is focused on economic roads with environmental responsibility. In this sense, Garruchos assumes this commitment from its policy, sets objectives, develops programs and plans to achieve them. Environmental management is based on the **prevention and mitigation** of the negative impacts that operations could cause on the environment and that were previously evaluated through Environmental Impact Studies. It has as a tool an aspect-impact analysis matrix that is kept up to date and where new activities or impacts that could be developed are incorporated. *See PG 001 Evaluation of Environmental Aspects and Impacts*. Based on the matrix, the impacts are assessed and prevention, mitigation and/or compensation measures are determined.

16.1 ENVIRONMENTAL MEASURES

The environmental measures implemented based on environmental assessments are the following:

- Operating procedures
- Waste Management Plan
- Hydrocarbon management and handling
- Spill Management Procedure
- Responsible Agrochemical Management Program
- Natural Area and HCV Conservation Plan
- Conservation plan for threatened, endangered, rare species
- Invasive Alien Species Control Plan
- Heritage Protection Plan
    a. Guards and heritage tours
    b. Fire management and fighting plan with equipment
    c. Network of roads and firebreaks
    d. Fire Guards
    e. Fire Warning Towers
- Incident Reporting System
- Communication system and daily reports
- Regulation and control of restricted activities
- Operator Training and Education
- Dissemination and communications plan

- Managing Restricted Activities
- Planting according to buffer zones
- Compliance with environmental regulatory provisions

All Garruchos forestry operations are carried out according to general and specific operating procedures. The general ones apply to all activities and are linked to the responsible management of waste, hydrocarbons, agrochemicals, incident reporting, among others. The procedures contemplate the steps to be followed for responsible environmental management of activities during forestry operations.
Forest management is framed within the applicable legislation in force. The recommendations of the available manuals of good practice, ILO recommendations on Health and Safety, scientific publications, and expert recommendations are taken into account.

Garruchos is committed to responsibly managing agrochemical products, from their purchase, handling, application, storage and final disposal. In this sense, all necessary measures are taken to prevent and reduce the impact on the environment and the risks of the personnel who operate with them. See PO 003, *Program for the Responsible Management of Agrochemicals*.

Waste management is another aspect considered and treated in order to reduce the impact on the environment and the people who handle it. The waste generated during operations is managed and classified as organic, inorganic, and special. Waste that, due to its characteristics, is considered special is managed in particular. They are temporarily stored in warehouses conditioned for this purpose, registered and declared in accordance with the applicable regulations. See *PO 006 Waste Management.*

The handling of fuels and lubricants during operations is carried out under responsible procedures. They are stored in warehouses identified and conditioned for this purpose. Pollution derived from hydrocarbons is prevented through preventive maintenance of vehicles and machinery, storage in containment rafts, and a management kit for possible spills. See *PO 013 Handling of Fuels and Lubricants.*

A control plan for invasive species allows monitoring the dispersal of these species outside the limits of the stand. Care is taken that these species do not develop in areas destined for conservation, areas of protection of watercourses, areas of high value for conservation.

The monitoring of the application of good forest management practices, maintenance and works on the roads are aimed at protecting the soil through the prevention and control of erosion.

Forest management measures are implemented to maintain the quality of surface waters and prevent contamination. In a comprehensive way, these measures protect the quality of the waters for aquatic life and maintain it with admissible values of environmental quality. The most significant measures taken are: waste management, hydrocarbon

management, responsible management of agrochemicals and disposal of residues, design and maintenance of road networks, road works (bridges, sewerage, etc), protection areas in watercourses (riparian forests), planting distances to water bodies and protection zones in general.

The heritage protection plan establishes the control measures that are adopted to detect and combat forest fires, in order to avoid or minimize the economic and environmental impacts (impact on biodiversity). See Heritage Protection Plan PO 007.

The **management of restricted activities** within the properties allows controlling and avoiding damage to heritage areas, conservation areas and areas of high conservation value. These activities are reported on billboards at the entrances to the establishments, they are communicated to the operators through training and they are disseminated to the neighboring community through educational and communication programs. The restricted activities are as follows:

Table 2: RESTRICTED ACTIVITIES

RESTRICTED ACTIVITIES
1- Regulation of the entry of strangers to the premises
2- Prohibition of the entry of dogs
3- Prohibition of use of fire
4- Prohibition of hunting and fishing
5- Prohibition of timber extraction

The plantations are installed leaving a buffer or buffer area with protection areas (PAs), areas of high conservation value (HVA) and in accordance with the provisions of applicable regulations. The distance to the PAs or AVCs is at least 10 meters except in the Establishments located within the Iberá Natural Reserve. Its Provincial Decree No. 1440 Corrientes 2008 in relation to the creation of the Iberá Natural Reserve, provides that the security or buffer strips surrounding the outer limit of the estuary, marsh or floodplain of the alluvial valley of the main river of the system is 70 meters. Those surrounding the outer limit of the banks of lagoons and/or the outer limit of estuaries and medium ravines are 30 meters.

The provisions of the native forest law 26.331 for conservation categories. Article No. 16.- Category 1 (Red): a) Definition: This category is defined in accordance with the provisions of National Law No. 26,331, as that which corresponds to sectors of native forest of very high conservation value that should not be transformed. It includes areas that, due to their location relative to reserves, their connectivity value, the presence of outstanding biological values and/or the protection of watersheds they exert, merit their persistence as a forest in perpetuity, although these sectors may be the subject of scientific research. The provisions of the regulatory decree DR 133/99 of the law for the promotion of cultivated forests 25.0080 establishes that firebreak streets free of fuel in critical periods. The perimeter of the plantations as a whole, on public roads and railways of no less than (20) meters wide.

For productive establishments located in the Provincial jurisdiction of Misiones, the Protective Forests Law No. 53 formerly Law 3426 provides protection for the forests:

- Forests that form galleries of watercourses three times the width of the watercourse and not less than 5 meters.
- Forests that cover watersheds that originate watercourses within a radius of 50 meters around them.
- Those that cover the perimeters of reservoirs and lagoons a width of 100 meters.
- Waterlogged or marshy land.
- Those that cover artificial channels a width of 20 meters.

16.2 CONSERVATION AREAS

Forest management conserves biological diversity, water, soil, landscape, fragile and unique ecosystems. Protection and conservation zones and areas are established, delimited and defined. The total area of these areas is 40.6ha. Conservation areas allow us to protect rare, threatened and/or endangered species such as. Likewise, rare sites or with the presence of endemic species such as Reserves, lagoons and wetlands are protected. The aim is to achieve connectivity between the reserve areas within the Establishments and with the neighbors.

In order to contribute to the conservation of endangered fauna species, Garruchos has a **"Conservation Program for the Pampas Deer and Tordo amarillo".** Through a letter of cooperation agreement with the NGO *Conservation Land Trust* , lines of work were agreed to promote the recovery of the environment where these two species live, long-term monitoring and follow-up, study of behavior in forest environments, training and training of personnel in charge and recovery of deer from the pampas in other sectors.

The care of the conservation areas is the responsibility of all the members of the company, and their specific management is coordinated by the Environment, Health and Occupational Safety area of Garruchos.

16.3 AREAS OF HIGH CONSERVATION VALUE

There are areas that may contain one or more biological, social, and/or cultural attributes considered to be of critical or exceptional importance. When these attributes are identified, the areas are declared of *High Conservation Value*. This statement is made after an analysis and evaluation of the attributes present. Management and monitoring are determined to maintain and improve these areas.

16.4 PLANS FOR THE CONSERVATION OF RARE, THREATENED OR ENDANGERED SPECIES

The Garruchos fields contain diverse and representative ecosystems of the region: grasslands, gallery forests, *mogote* forests, lagoons, rivers, streams, and estuaries. These ecosystems are composed of a diversity of native vegetation species and also serve as a refuge and development for a great diversity of fauna species. They are also important

because of their extension, their ecosystem functions, protection, and connection with other environments. Some of them are very particular, which gives them conditions for the development of endemic or specialist species. Threatened or endangered species can also be found in these ecosystems.
The conservation plans for these areas and the environmental monitoring plans already mentioned involve, among other measurements, the identification of rare, threatened or endangered species. As a result of these identifications, lists of these species emerge, and when the concentration is high, CVAs can also emerge. The Networked Wildlife Monitoring Program (PMFR), which involves the participation of field forestry personnel, identifies on a monthly basis the occasional sighting of these species, and/or those species that indicate the conservation status of the environment.

16.5 ENVIRONMENTAL CONTEXT

The province of Corrientes is home to some of the most privileged places in the world, where very diverse ecosystems are found, the complex of Wetlands and Lagoons of the IBERA being significant. There are also native forests in galleries, in *mogotes*, grasslands on hills, in mid-hills and grasslands in the lower areas, bordering estuaries and lagoons, generating very particular environments that are home to a large number of species of birds, mammals, amphibians, reptiles and insects, among others. The province of Misiones
on the other hand, it is represented in a greater proportion by ecosystems with a predominance of forests in the central and northern zone. The Misiones rainforest is home to 52% of Argentina's plant biodiversity, constitutes the largest continuous block of the Atlantic Forest and one of the national priorities in terms of conservation of its species. However, in the southern area where most of the establishments in Pomera are located, the so-called fields and weeds predominate, an ecosystem that it shares and also extends to the northeast of the province of Corrientes. The ecosystem of fields and weeds is characterized by being grassy savannahs, alternating with shrubs or groves. In Corrientes, it merges into an ecotone complex with the Chaco Province.

Garruchos, as part of its environmental policy, took as a basis the document "Preliminary Bases of the Management Plan of Conservation Areas", work carried out by the Center for Applied Ecology of the Coast (CECOAL) and "Management of Areas of High Conservation Value" by the same author.

The properties of GARRUCHOS S.A., FORESTAL AGUARÁ CUÁ S.A., and GARRUCHOS FORESTACIÓN S.A. are located in two well-defined basins, the Uruguay basin and the Paraná basin.

They involve areas in which well-defined ecosystems can occur, such as:

- ✓ Paraná Fluvio Forest (on the banks of the Paraná).
- ✓ Jungle in galleries or riparian (rivers and streams).
- ✓ Hygrophilous forests on islets (mogotes, patches)
- ✓ Palmares of *Butia paraguayensis* with *Aristida cubata* (by the estuaries)
- ✓ Lower and Middle Hills of the albardón that surrounds the Ibera estuary with hygrophilous pastures, forming corridors between the plantations.

- ✓ Mesophilic grassland
- ✓ Lagoons and estuaries.

In these ecosystems there are a large number of plant species (plants, trees, grasslands) that characterize them. Each one with a singular importance.

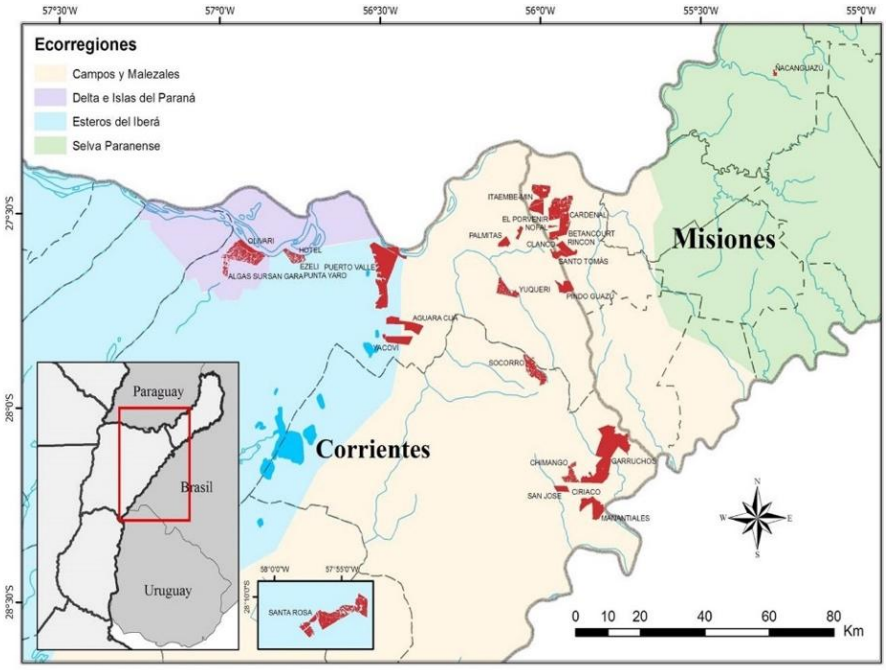
The company is committed to continuing with the Conservation of Biological Diversity through the protection of native vegetation and wildlife within their natural habitats; As well as taking care of the environment in which it develops activities (industrial forestry) throughout its cycle, carrying out protection and awareness actions.

The methodology and results of this work can be consulted in the Technical Progress Reports provided by the University and the reports of the Researchers.

16.6 ENVIRONMENTAL CHARACTERIZATION

The Garruchos forest management units are distributed in four ecoregions of northeastern Argentina: Campos y Malezales, Esteros del Iberá, Selva Paranaense and Delta and Islas del Paraná (Burkart et al. 1994). The largest proportion of the forested area of Garruchos is located in the Campos y Malezales ecoregion, which covers an area of 27,680 km2 and covers a large part of eastern Corrientes and southern Misiones. The rest are distributed in transitional environments between ecoregions or isolated in central areas of the provinces of Corrientes and Misiones.

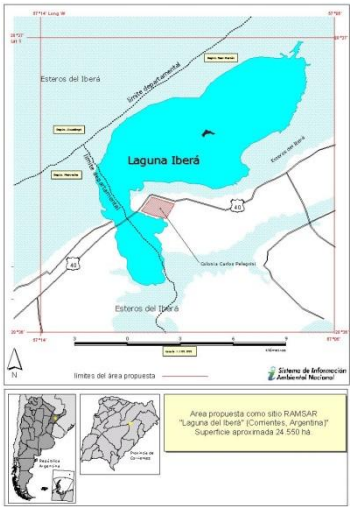
Map 2: Ecoregions



The area is of international importance because it constitutes a broad ecotone between important and heterogeneous ecosystems of grasslands, wetlands and temperate-subtropical forests that cover four countries: Argentina, Brazil, Paraguay and Uruguay (Cabrera 1976; Dinerstein et al. 1995).

In the hydrological aspect, the area is irrigated by numerous important river courses linked to the basins of the Paraná and Uruguay rivers, which in turn belong to the La Plata

basin, the second largest in South America after the Amazon (3,200,000 km2) and shared with Brazil, Paraguay, Bolivia and Uruguay (Berbery and Barros 2002). In addition, the development of these watercourses is strongly influenced by the topography of the region, which presents important zonal and southern variations (Camilloni 2005).
In the subsoil, and linked to the hydrological basins mentioned above, is the Guarani Aquifer, one of the largest underground reservoirs of fresh water in the world, with a surface area of 1,200,000 km^2 and approximately 30,000 km^3 of storage (Rabelo and Wendland 2009).



Linked to wetland environments, the Iberá macrosystem stands out, one of the most important at the continental level, ranking second in the world together with the Brazilian Grand Pantanal (Neiff and Malvárez 2004). One of the lagoons of the Iberá estuaries located in the vicinity of the town of Colonia Pellegrini is declared a RAMSAR site for the province of Corrientes, far from the reach of the Garruchos Group Establishments. The Convention entered into force in Argentina on 4 September 1992. Argentina currently has 22 sites designated as Wetlands of International Importance (Ramsar sites).

Taking into account that the conservation value of biodiversity is scale-dependent, and considering from local and regional contexts to international spheres, the presence of 19 species of flora and 29 species of fauna (including birds and mammals) under some categorization of threat is highlighted, accentuating the importance of the natural remnants existing in the forest units where they are developed.

Among the bird species that are threatened on a global scale are the Yetapá de collar (*Alectrurus risora*), the Monjita dominicana (*Xolmis dominicanus*), the Eagle coronada (*Harpyhaliaetus coronatus*) and the Ñandú (*Rhea americana*). Since 2011, 6 species of birds have been added to the list of Natural Monuments, of which two (monjita dominicana and yetapá de collar) have records in the periodic monitoring of biodiversity carried out in various forest properties. The declaration of these species as a Natural Monument represents a legal contribution of relevance for their conservation and valuation.

Among the mammals registered on the company's premises are seven species with some degree of threat (IUCN 2014). Four of them in particular: pampas deer (*Ozotoceros bezoarticus*), ciervo de los pantanos (*Blastocerus dichotomus*), aguará guazú (*Chrysocyon brachyurus*) and lobito de río (*Lontra longicaudis*), were declared as Natural Monuments by federal intervention in 1992 for the province of Corrientes.

The presence of these species justifies and supports the importance of the conservation of these natural environments. This is possible to be carried out and maintained over time by Garruchos given its commitment to the development of responsible production.

The company's forestry units are located in a region of Argentine Mesopotamia considered to be of high conservation value (Zuleta et al. 2005). In this sense, the occupied areas are shared with Areas of Importance for the Conservation of Birds (AICAs).

At the local/farm scale, it is possible to distinguish particular environments by their extension, their ecosystem function and/or their conservation value. Their relevance is increased considering that they are usually located in direct contact with forest species, planting areas, transit areas and infrastructure where forestry operations are carried out. The natural environments found on the grounds serve as a refuge for a great diversity of organisms.

17 SOCIAL MANAGEMENT

The forest management of Garruchos is focused on economic roads with social responsibility. In this sense, Garruchos assumes the social commitment internally with all its personnel and the personnel of contractors or third-party services, and externally with the community, neighbors and governmental and non-governmental institutions. From its policy, it sets objectives, develops programs and plans to achieve them. Follow-ups are carried out that provide results and indicators that allow the necessary improvements to be made.

The main objective of the Garruchos Group's Social Management Plan is to build and maintain permanent relationships of trust with those stakeholders who live with forestry activity on a daily basis, seeking to preserve and create social value. The main stakeholders with which Grupo Garruchos and its forestry area relate are: workers, contractor companies and their workers, communities in the area of influence of the operations, suppliers and customers, municipalities, authorities, non-governmental organizations, universities and scientific institutions, the media and civil society in general. With all stakeholders, Grupo Garruchos seeks to maintain a relationship based on respect, transparent and honest communication, promoting spaces for dialogue and understanding.

The area of influence is defined as the area comprised of the localities, colonies and places adjacent to the forest properties and their access roads.

The activities derived from the Garruchos forest area generate direct and indirect jobs, to more than 250 people in supervisory positions and operators, through 20 forestry service companies, giving preference to those who live in the cities and towns near the forest area.

All forestry workers are registered in formal employment and all their rights and benefits are guaranteed by Garruchos' commitment to local and national laws on the conditions of contracting forestry services, as well as to the international conventions ILO 87 and 89.

Forestry operations generate revenues that pay provincial and national fees that result in indirect social benefits. In addition, it contributes with material aid to health and education institutions, mainly.

17.1 SOCIAL COMMITMENT

Through its social responsibility, Garruchos proposes the following:

- ✓ The company intends to have a positive impact on its own personnel, contractors and people in the areas of influence.
- ✓ Generate and provide employment, prioritizing people who live in cities and towns near properties.
- ✓ Contribute to the improvement of the quality of life of forest workers, their families and nearby communities.
- ✓ Preserve the health and safety of all own personnel, contractors and surrounding towns.
- ✓ Promote the Health and Quality of Life of its employees and area of influence.
- ✓ Provide equal employment opportunities, not discriminating in any way (sex, color, religion).
- ✓ Ensure that all employees (own and contractors) have the appropriate training for the task they perform and are competent in the activity they carry out.
- ✓ Provide opportunities for its own personnel and contractors, in education, mainly for those who could not complete formal education.

17.2 SOCIAL STAFF-OPERATORS

Garruchos' social management is focused on maintaining and improving working conditions, contributing to a good quality of life for its staff and operators of service providers or contractors. Develop technical capacities and encourage professional development by providing personnel with training and education in operational aspects, safety and work environment, labor rights and obligations, and the importance of environmental protection. Ensure a safe and healthy work environment for our staff and contractors. Generate formal job opportunities giving priority to local people. Ensure that labor contributions such as social contributions, life insurance, social work, retirement contributions, occupational accident insurance, food, are covered in accordance with the applicable and current legal framework. Recognize the free association of trade unions.

Each year a schedule of training is planned that includes the aforementioned topics and according to the operating procedures as well as the importance and mode of use of personal protection elements suitable for each task, recognition of native and endangered fauna, importance and location of conservation and high-value areas, FSC forest certification concepts®, concept of the forest management plan and the company's policy, aspects related to housing and food, first aid.

In order to promote disease prevention, field days are coordinated with the nearest health centers for vaccination in accordance with current national campaigns, such as the flu and yellow fever vaccines.

The prevention of endemic diseases such as dengue takes place through dissemination campaigns and training in disease prevention.

Below is the list of Operating Procedures that apply to forest management of this project:

LIST OF PROCEDURES

- GUIDE 01 FOREST MENU

-ANNEX I SNAKE EMERGENCY

-M 001 FIRST AID AND EMERGENCY RESPONSE TRAINING COURSE MANUAL

-M 002 FIRST AID IN INDUSTRY MANUAL PG 001 -ENVIRONMENTAL IMPACT ASSESSMENT

-PG 001 RISK ASSESSMENT

-PO 001 FOREST CAMPS

-PO 003 RESPONSIBLE AGROCHEMICAL MANAGEMENT PROGRAM

-PO 004 TRANSPORTATION OF PERSONNEL AND FOREST PRODUCTS

-PO 005 FOREST ROADS

-PO 006 WASTE MANAGEMENT

-PO 007 HERITAGE PROTECTION PLAN

-PO 008 NON-COMPLIANCES

-PO 010 PLOTS

-PO 012 LAND PREPARATION FOR PLANTING

-PO 013 FUEL AND LUBRICANT MANAGEMENT

-PO 014 RESOLUTION OF COMPLAINTS AND CONFLICTS

-PO 015 POST MANUFACTURING

-PO 016 FENCE CONSTRUCTION

-PO 017 CHAIN OF CUSTODY PROCEDURE

-PO 018 MEDICAL EMERGENCY PLAN

-PO 019 REGULATION OF CATTLE GRAZING

-PREVENTIVE MEASURES FOR COVID-19

The company's staff participates in courses, talks and exhibitions in the sector. Garruchos is a member of two consortiums of forestry companies, and of other civil associations linked to responsible forest management.

- Corrientes Norte Forest Consortium
- Corrientes Centro Forestry Consortium
- Fire Management Consortium
- AFOA
- FSC Argentina National Office
- APEFIC
- Management Board of the Zaiman Basin
- INTA Phytosanitary Platform

In the Forest Consortia, monthly meetings are held where the host company designs a tour of the fields showing the issues in which it has problems or in which it has found a solution to a given problem. After the tour, a debate is held from which the conclusions and recommendations for the organizer are obtained.

17.3 SOCIO-ECONOMIC CONTEXT

The Garruchos forestry project is being developed in the northeast of the Province of Corrientes and the south of the Province of Misiones, both provinces have the largest forested area in Argentina. The properties are located in two departments of the province of Corrientes: Ituzaingó and Santo Tomé, and in Misiones in the Capital department. The main localities closest to the camps are Gobernador Virasoro, Ituzaingó, Garruchos and Garabí in Corrientes, and in Misiones Posadas, Azara, and Apóstoles. Also near the fields are Parajes and less populated localities such as Pje. Colonia Unión, Pje. San José, Pje. Libertad, Pje. Santa Tecla and San Carlos. In the vicinity of the Garruchos fields, there are numerous neighboring properties dedicated mainly to forestry, yerba, livestock and rice, where the population is rural.

The provinces of Corrientes and Misiones present in much of the same exceptional conditions to implant non-native-non-invasive species such as pine and eucalyptus. Its subtropical climate, rainfall regime of 1,000 to 1,700 mm, annual levels of solar radiation, type of soils, relief of plains and gentle hills in Corrientes, and relief of plateaus, gently undulating, with deep soils in Misiones, favor the development of these species for which it is possible to expect yields of 25 and 35 tn/ha/year respectively.

Province of Corrientes

The province of Corrientes has a total area of 88,199 km^2 and a population of 992,595 inhabitants (INDEC CENSUS, 2010), that is, it has a population density of 11 inhabitants per km2. Based on data from the 2010 National Population and Housing Census, the cities closest to forestry operations are in the province of Corrientes, the city of Ituzaingó, head of the department of the same name, with 22,000 inhabitants. the towns of Santo Tomé with 25,000 inhabitants, and Virasoro Governor with 30,000 inhabitants, both located in the department of Santo Tomé (INDEyC, 2010).

Forestry activity is part of one of the main productive chains of the province along with cattle ranching, rice, sweet citrus, yerba mate, horticulture, among others.

Table 3: FOREST CENSUS

Forest area (ha)	Province of Corrientes	Ituzaingó Department
Pinus sp	312,365	71,267
Eucalyptus sp.	107,458	10,296
Other species	6,160	
Total Census 2015	**425,983**	**81,563**

Data from the Update of the Forest Census of the Province of Corrientes – Final Inf. September 2015 – CFI

Corrientes represents approximately 1% of the country's total GDP. In the composition of the provincial GDP, the percentages indicate that Goods represent 44.0% and Services 56% (year 2012). Within the Assets, Agriculture, livestock, hunting and forestry participates with 14.5% (forestry represents 31.4% of this value); Manufacturing industries: 16.8%; Electricity, gas and water: 4.2%; Construction: 8.5%. It has a total area

of 88,199 km2 and a population of 992,595 inhabitants (INDEC CENSUS, 2010), with a population density of 11 inhabitants per km2.

The demand for formal jobs in the private sector by the Services sectors is in the order of 60% (according to information from 2013). Among these sectors, the "Commerce, hotels and restaurants" category stands out, which contributes almost 12% of the provincial GDP and demands 25% of formal jobs in the private sector. Among the sectors that produce goods, industrial activities and the agricultural sector are relevant. The agricultural sector demands almost 17% of formal private jobs. The manufacturing industry accounts for 15% of formal private employment, with the production of food, beverages and tobacco products standing out in particular[1].

The forestry establishments of Garruchos are located in two departments: Ituzaingó, Santo Tomé and Santo Tomé, located in the extreme north of the province of Corrientes.

Ituzaingó Department

The Olivari Forestry Center is located in the northern rural area of the Department of Ituzaingó, where the activity is predominantly agricultural with greater emphasis on cattle ranching and forestry.
The Department, with 9,649 km^2, 10.9% of the provincial total (88,886 km^2), has a total population according to the 2010 census of 31,150 inhabitants, which represents a density of 3.6 inhabitants/km^2. It is divided into 5 municipalities: Ituzaingó, San Carlos, Colonia Liebig, San Antonio and Villa Olivari.

The population with at least one indicator of NBI reaches 20% (total of the country: 9.1%), according to the 2010 National Census. The following table presents some sociodemographic indicators at the national, provincial and departmental levels.

Table 4: POPULATION DATA FROM THE ITUZAINGÓ DEPARTMENT

Indicator	Nation	Province of Corrientes	Ituzaingó Department
Population (No. of inhabitants)	40.117.046	992.595	31.150
Population Density (inhab/km2)	14.43	11.3	3.6
D. of Rural Population (inhab/km2)	8.9	17.2	s/d
Infant mortality (per thousand live births) From 0 to 5 years	11,9	16,8	17,5
Population without Obra Social coverage (%)	36.1	48.4	s/d
Illiteracy (%)	1.9	4.3	1.1
Households with NBI (%)	9,1	15.1	17,0

Source: INDEC. National Census of Population, Households and Housing 2010
http://www.indec.gob.ar/ftp/cuadros/poblacion/censo2010_tomo1.pdf
http://www.deyc-corrientes.gov.ar/

Santo Tomé Department

The Department of Santo Tomé occupies 7,094 km² in the northeastern region of the Province. It is bordered to the west by the Departments of Ituzaingó, San Martín and Alvear; to the south by Alvear; to the east by the province of Misiones and Brazil, from

[1] https://www.economia.gob.ar/dnap/economica.html

which it is separated by the Uruguay River; and to the north by the Department of Ituzaingó. The capital of the department is the homonymous São Tomé, a town where the International Bridge over the Uruguay River is located, which joins the Federative Republic of Brazil.

According to INDEC estimates, in 2010, the population of the Department was 61,297 inhabitants with a density of 8.3 inhabitants/km^2. It is distributed in five municipalities: Santo Tomé, Garruchos, Virasoro Governor and José R. Gómez (Garabi).

The population with at least one indicator of NBI reaches 17% (10,657 inhabitants) according to the 2010 National Census. http://www.deyc-corrientes.gov.ar/

Table 5:POPULATION DATA IN THE DEPARTMENT OF SANTO TOMÉ

Indicator	Nation	Province of Corrientes	Santo Tomé Department
Population (No. of inhabitants)	40,117,046	992,595	61,297
Population Density (inhab/km2)	14.43	11.3	8.3
D. of Rural Population (inhab/km2)	8.9	17.2	n/a
Infant mortality (per thousand live births) From 0 to 5 years	11.9	16.8	5.2
Population without Obra Social coverage (%)	36.1	48.4	n/a
Illiteracy (%)	1.9	4.3	2,0
Households with NBI (%)	9.1	15.1	14.0

Source: INDEC. National Census of Population, Households and Housing 2010
http://www.indec.gob.ar/ftp/cuadros/poblacion/censo2010_tomo1.pdf
http://www.deyc-corrientes.gov.ar/

Province of Misiones

The province of Misiones has an area of approximately 29,801 km^2 and a population of 1,101,593 inhabitants (INDEC CENSUS, 2010) with a density of 36.8 inhabitants per km^2. In the Province of Misiones, the closest locality to the properties is the City of Posadas, provincial capital with 323,739 inhabitants. (INDEyC, 2010). Being the capital of the province, it has road infrastructure, services such as health centers, security forces, educational centers, gastronomy, mechanics, and necessary inputs for the development of productive activities.

The productive structure of the Misiones economy is based on both primary production and manufactures derived from the processing of agricultural and forestry products. The main agricultural activities are linked to the traditional crops of yerba mate, tea and tobacco. The forestry chain is one of the main axes of the province's economic activity, and those linked to tourism are also significant. Misiones is the second largest timber-producing province, after Corrientes. The Province has a diversity of establishments that process wood; which make up a heterogeneous segment, from artisanal micro-enterprises to large export industries with state-of-the-art technologies, with a predominance of small establishments. Other indicators show that, in Misiones, the percentage of households with NBI reaches 15.6%, the infant mortality rate is 10.4%, and the maternal mortality rate is 4.7%. Registered employment represents 1.7% of the

country's total, the branches with the highest level of employment are: services (37.6%), commerce (19.5%), industry (19.1%), construction (12.3%) and agriculture, livestock and fishing (9.8%). 43.6% of the population does not have social coverage. In this context, the establishments located in the Capital Department are in the place with the highest population density in the province.

Table 6: DEPARTMENTAL POPULATION OF MISIONES

Department	Area (km^2)	Population	Population density (inhab/km^2)
Total provincial	29,801	1,097,829	36.8
Apostles	1068	42,459	39.8
Cainguas	1608	53,267	33.1
Candlemas	875	26,713	30.5
Capital	965	323,739	335.5
Conception	726	9,510	13.1
Eldorado	1960	78,152	39.9
General Manuel Belgrano	3275	42,929	13.1
Guarani	3314	67,698	20.4
Iguazu	2769	81,215	29.3
Leandro N. Alem	1185	45,271	38.2
Libertador San Martin	1524	46,333	30.4
Monte Carlo	1723	36,998	21.5
Oberá	1620	106,882	66.0
Saint Ignatius	1607	57,471	35.8
San Javier	536	20,821	38.8
Saint Peter	3407	31,050	9.1
May 25	1639	27,323	16.7

Source: INDEC. National Census of Population, Households and Housing 2010 and Military Geographic Institute .
In 2015 the total estimated population of the Province was 1,181,477 inhabitants. (Ministry of Public Health of the Government of the Province of Misiones).

17.4 EMPLOYMENT IN GARRUCHOS

The modality of hiring labor is through contractor companies in the area, using as a selection criterion compliance with all current legal regulations regarding workers' compensation, retirement, occupational health and safety coverage, food and housing; freedom of association and collective bargaining. Priority is given to people coming from the area of influence of the project, defining as such, that which includes the localities, neighborhoods and places neighboring the forest properties and their access roads. The control of compliance with these regulations is carried out through an online digital platform (EHS), and field controls.

The main establishments have permanent facilities for administration, and in particular in the El Porvenir Establishment there are central administration facilities, and facilities for the temporary housing of the personnel of Forestry Contractors. Most of the personnel

working in the forestry operations reside in their homes and remain on the field only during the working day and return home for lunchtime. The supply of drinking water is carried out directly, from the domestic network of the town of residence. The provision of food during the working day for personnel who do not reside in localities near the premises, and therefore do not return to their homes for lunch, is carried out through the food services of authorized suppliers in the same locality such as: Villa Olivari, Virasoro, Ituzaingó, Santa Tecla. For those who reside they return to their homes to have lunch or temporary and mobile dining rooms are provided within the Establishment that also functions as places of shelter and rest. Sanitary facilities are provided, which are located at a distance from the watercourses and the temporary dining room. The waste generated by the operations is classified according to type (organic, inorganic, special). Containers are provided for collection and final disposal according to the class.

Measures are implemented to guarantee the safety of forestry workers, taking into account national requirements in this area, the provision of safety equipment, work clothes, risk assessments, operating procedures, and training.

The project proposes that workers be properly protected against workplace accidents and/or damages of any kind within the workplace.

A permanent training plan is developed for personnel, both in the specific issues of the tasks to be carried out, as well as in hygiene and safety measures, forest firefighting and environmental aspects (such as preventive practices, protection of fauna and flora, etc.).

The personnel is supervised in their tasks by a Foreman, who has sufficient technical knowledge and is authorized to make decisions regarding the forest management of the area under his charge, avoiding alterations to the environment and ensuring the application of the proposed mitigating measures, as well as compliance with the legislation in force in the area of Occupational Health and Safety (Law No. 19.587/72 and its Decree Regulation No. 351/79).

The above allows the personnel who work at Garruchos to achieve a degree of training and specialization in such a way that enables them to excel, both in their income levels and quality of life.

17.5 SOCIAL COMMUNITY

Garruchos seeks to maintain and strengthen ties with the surrounding populations and their authorities, in a relationship based on respect for customs, beliefs, rules of coexistence, which express the local culture. Generate the conditions for the local workforce to be linked in the business chain and promote the improvement of the necessary qualification through training and transmission of knowledge and know-how. Respect for natural resources such as soil, water sources, air, biodiversity, fauna and other resources is a central issue in this relationship. They seek to strengthen local development through participatory actions and programs in primary and secondary schools, and contributions that favor local development. Maintain and strengthen ties with governmental and non-governmental organizations that allow mutual strengthening.

As part of its social responsibility, Garruchos has a social management plan through which plans and programs for linking with the community are developed.

Educational Program Initial and Primary Level "The Jungle and the Forest":

It is aimed at neighboring schools of initial and primary level in the area of influence of Pomera maderas. The day has a first phase of presentation of the topic through images and videos on the difference between implanted and native forests, the importance of conservation and the goods and services that forests provide us, the presentation of Pomera and its work policy. A second stage continues with a recreational or expression space through group drawing in sheets, or the planting of native trees.

Educational Program Initial and primary level "More forests, more future":

Educational program with virtual modality, with the objectives of bringing to students of primary and secondary schools in the south of the province of Corrientes and the north of the province of Misiones content related to the forestry sector, wood production as a sustainable activity and the preservation of ecosystems. To promote the incorporation of good practices and environmental commitment in children and adolescents, from a perspective of respect and responsible use of natural resources. To make a "call to action" to children and adolescents so that they take an active role in the dissemination of these good practices and become multipliers of the message in their communities of reference and other spaces in which they participate. Strengthen the company's bond with the community, communicating its business values and commitment to the development of a productive activity that generates not only economic value, but also social and environmental value.

EFAs Educational Program:

It is intended for rural secondary schools or schools linked to the rural sector in coordination with the Corrientes Fire Management Consortium. Educational days are organized in two stages. The first on the forestry sector in the region, the social and environmental responsibility of the companies that make up the sector, will highlight the completion of the school year. The second stage is transmitted the responsible use of fire and controlled burns, ending the day with the demonstration of a controlled burn in the field by the Garruchos fire brigade. It is carried out in coordination with companies in the Corrientes Norte sector. Technical talks adapted to Rural Schools, with basic contents of the Forestry Process, Nursery, Forestry, Forest Management and safety in rural work.

Scholarship Program:
This program provides the opportunity to continue training at the tertiary or university level for those students from schools linked to the rural environment who have good academic performance. It is achieved through agreements with educational institutions such as the Navajas Centeno Institute.

Internship Program:
Based on the curricular proposal of the studies taken in tertiary or university careers linked to forestry, environmental, occupational health and safety, practical training activities are carried out with students of advanced courses. The aim is for them to deepen the appreciation of work as an indispensable and dignifying element for life, to carry out complementary practices to their academic training, to enrich their curriculum, to incorporate knowledge and skills, and to acquire knowledge that contributes to improving their possibilities of insertion in the workplace.

Dissemination and communication plan

The dissemination and communication of the Company's policy, the management plan, the conservation areas and high conservation value is carried out through different means of communication. On Pomera website you it can be found the public summary of the management plan and results of the monitoring, as well as a description of all the areas of work and news. http://www.pomera.com.ar/. Likewise, the public summary is delivered during visits to the properties of different organizations as well as the operations and areas of conservation and high conservation value.

Educational programs for neighboring primary and secondary schools are another space for communicating these messages. The schedule and training plan for forestry operators includes specific topics such as FSC® where the company's policy is developed and the importance of compliance with standards in operations, the importance of conservation and safe work.

Another tool used for communication is the distribution of instructional brochures for safety and environmental guidelines in forest loading and transport, FSC® Forest Certification, prevention of endemic diseases such as dengue.

18 ADMINISTRATIVE ASPECTS

18.1 ORGANIZATIONAL STRUCTURE

The organizational structure of Garruchos is presented in the following figure.

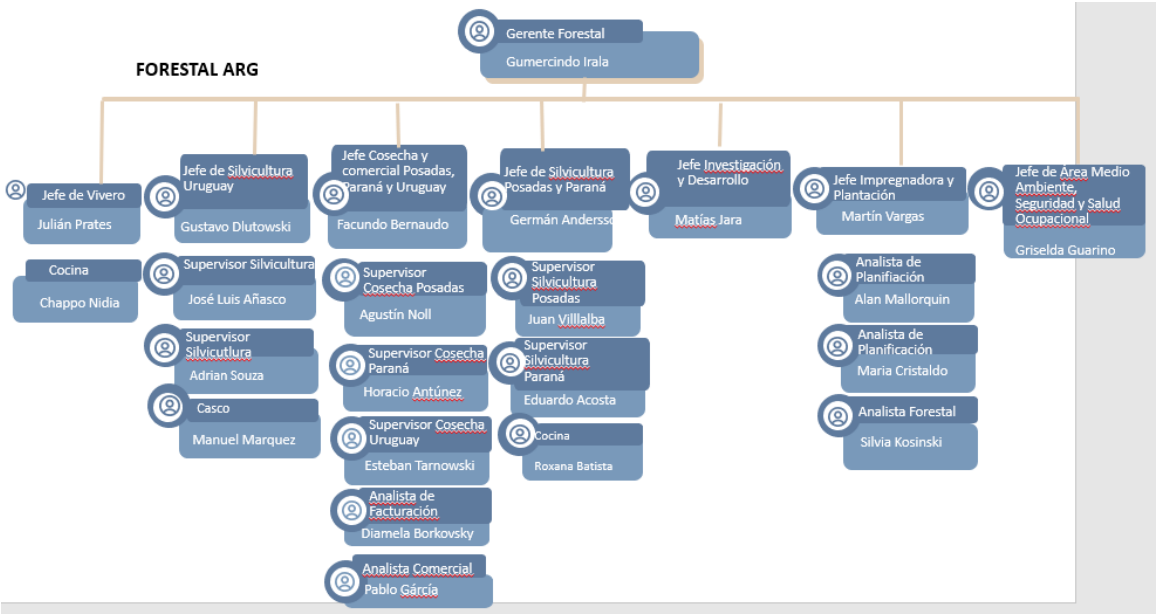


Figure 2: Organizational Structure

18.2 APPLICABLE LEGISLATION

Grupo Garruchos develops all its productive forest management activity in accordance with the applicable national and provincial legal framework. The laws, decrees, resolutions, ordinances and provisions that apply to forestry activity are those related to land use, incentives for forestry production, safety at work, labor and environmental protection. It manages its operations taking into consideration the recommendations of local good forest management practices and takes into account the publications or results

of expert trials. It considers international provisions regarding safety and health in forestry work, international lists of species with degrees of threat such as CITES and IUCN.

The basic norm that regulates the forestry activity of Cultivated Forests in the country is the Investment Law for Cultivated Forests No. 25,080, which has been extended for ten years by Law No. 26,432 in December 2008. It creates a promotion regime for forestry and forestry-industrial investments that includes, among other aspects, the implementation and management of forests and wood industrialization activities. Its most important regulatory norms are Decree No. 133/99 and Resolution No. 390/07 of the Ministry of Agro-Industry. These regulations provide in Article 5, for the performance of an Environmental Impact Study (EIA) for projects that contemplate the cultivation and economic use of forest species for areas greater than 100 ha in order to predict their possible positive and negative effects and define the measures to mitigate harmful impacts and establish an environmental monitoring and control system during the execution and useful life of the project. Regulatory Decree 133/99 in its Article 4, indicates the importance of the adaptation of the species to be implanted to the site and establishes in its Article 5 that the eligibility of the projects will be subject to the conservation or improvement of the biophysical environment and the natural resources involved. No. 133/99) to the competent provincial authorities to define the requirements and approve these studies, as well as to carry out preliminary verification of the documentation submitted and to certify the tasks declared by the project owners.

National environmental legislation, based on Article 41 of the National Constitution, is complemented by other national regulations that provide the legal and environmental framework for the use, management and conservation of natural resources. These include: Law No. 25,675/02, the General Environmental Law, which establishes the minimum requirements for the achievement of sustainable and adequate management of the environment, the protection of biological diversity and the implementation of sustainable development, defines the national environmental policy and the corresponding principles for its application; Law No. 22.421/81 regulating EIAs associated with wildlife conservation; Law No. 24.354/94, which imposes the obligation to carry out the EIA at the pre-investment stage in the projects of national public agencies and private or public organizations that require subsidies, guarantees, contributions or credits from the State; Law No. 13.273/48, which declares the defense, improvement and expansion of forests to be in the public interest and prohibits their devastation, as well as forest lands and the irrational use of forest products; Law No. 24.375/92 approving the international convention on biological diversity signed in Rio de Janeiro; Law No. 22.344/82, which prohibits international trade in endangered species of fauna and flora, and National Law No. 25.831/04, which establishes the regime of free access to public environmental information; Law No. 24,051/91 on Hazardous Waste, on the generation, handling, transport and treatment of Hazardous Waste; Law No. 26,331 on Minimum Budgets for the Environmental Protection of Native Forests and its Regulatory Decree No. 91/09.

In relation to the labor sector, the following are relevant: Law No. 26,727 on agricultural labor, its regulatory decree and wage resolutions, which governs the agricultural labor contract and the rights and obligations of the parties. Law No. 19.587/72 on Occupational Health and Safety and its regulatory standards Decree No. 351/79, Resolution No. 295/2003 of the MTSS, Decree No. 1338/96; Law 24.557/95 on Occupational Risks, which

deals with the prevention of occupational risks, contingencies, determination and review of disabilities.

The Environmental Impact Assessment (EIA) procedure in Argentina is not regulated by a special national standard, although the obligation to carry it out in the event of certain types of projects or affectations is indicated in Article 11 of the General Environmental Law No. 25,675 and by provincial jurisdiction regulations. Law No. 23,919 and Decree No. 693 of 04/16/91 approving the Ramsar Convention, relating to wetlands of international importance, especially as waterfowl habitat. It defines wetlands and their ecological function. The lagoons and estuaries of the Iberá have been a Ramsar Site since January 2002.

National Law No. 26,331 on Minimum Budgets for the Environmental Protection of Native Forests. It establishes the minimum environmental protection budgets for the enrichment, restoration, conservation, use and sustainable management of native forests.

With respect to the tax system, it is mainly structured on the taxation of income, wealth and consumption. At the national level, the Federal Administration of Public Revenues (AFIP) is the autarchic entity that, within the scope of the Ministry of Economy and Public Finance, is responsible for the application, collection and control of taxes. The main national taxes are the Income Tax, the Value Added Tax (VAT), the Minimum Presumed Income Tax, the Internal Taxes, the Personal Property Tax and the Tax on Debits and Credits in Bank Accounts and Other Operations.

The main laws at the national level

Law No. 26,432/08 which extends for 10 years Law No. 25,080 on Forestry Investments and its regulatory decrees.
Law No. 26,727 on Agricultural Labor, its Regulatory Decree and Wage Resolutions.
Law No. 19.587/72 on Occupational Health and Safety
Law No. 24.557/95 on Occupational Hazards
Law No. 24,051 on Hazardous Waste, DR, R, D.
Law No. 13.273/48 on the defense of forest wealth.
Law No. 25.675/02 General Environmental Law.
Law No. 26,331 on Environmental Protection of Native Forests.
National Electricity Regulatory Entity (ENRE): Resolution ENRE 602/2001; Law 24.065, Article 83; Law 19.552 / 1972; Regulatory Decree 1759 / 1972; Technical Specification T-80; Resolution 382/2015 (complements T-80).
Law No. 27,279 Management of empty phytosanitary containers.
National Education Law No. 26206.
Law for the Implementation of Comprehensive Environmental Education in the Argentine Republic under No. 27.621.
Law No. 2,873: GENERAL LAW OF NATIONAL RAILWAYS (Law No. 2,873 with the amendments introduced by Decree-Law No. 8,302 of July 19, 1957 and subsequent until 1995 applicable to Railway Concessionaires). Art 55 to 58.

The main laws at the provincial level: Corrientes

The province of Corrientes is adhered to the regime of National Law 25,080, extended by National Law No. 26,432, through Law No. 5,340; while Law No. 5,550 institutes the provincial regime for the Promotion of Forestry Enterprises.

Provincial Law N° 4.731 Law on the Preservation, Conservation, Defense and Improvement of the Environment, DR and R.

Law No. 5,067 on Environmental Impact Assessment (EIA) and its amendment No. 5,517, Provincial Decree No. 1440/09 regulating Law 3771/83 defines in its Article No. 4 the limits of the Ibera Provincial Reserve, and of the Iberá Provincial Park, in its Article No. 21 promotes the adoption of manuals of good practices for the sustainable development of the different productive activities. establishes the requirements for agricultural and forestry activities permitted in Articles 25 and 26, and establishes the content of the EIAs of projects to be carried out within the Reserve in Articles 27 and 28.

Law No. 5,590/03 regulating slash-and-burn in rural areas, as well as the prevention and fight against forest fires.

Law No. 5,974 on Territorial Planning of Native Forests, in adherence to National Law No. 26,331 on Minimum Budgets for the Environmental Protection of Native Forests. Law No. 4,361/92, on Soil Conservation and Recovery of Degraded Lands; Law 5,533/03 on the Environmental Public Information Regime, partially vetoed by Decree 2,091/03; Law No. 5,175/97 on the Preservation of Native or Implanted Forests; Law No. 4,495/90 on the Use of Agrotoxics; Law 5,394 on adhesion to National Law No. 24,051 on Hazardous Waste; Law No. 5,260/98, which regulates the Anthropological and Paleontological heritage; Law No. 1,863 on Hunting and Wildlife Conservation and its Regulatory Decree No. 2,249/55; Law No. 3,066 on the Water Code and its Decree Law No. 191, which establishes the general and particular regulations for water resources.

At the provincial level, taxes are collected and administered by the Provincial Revenue Directorates, bodies subordinate to the respective provincial Ministries of Economy. The main provincial taxes are the Gross Income Tax, the Stamp Tax, and the Real Estate Tax. Finally, at the municipal level, income arises from the collection of fees and contributions.

Likewise, the administrative and labor tax legal framework is complied with: Occupational Accident Insurance (ART); Retirement Contributions (ANSES); Family allowances.

For more information, see the compendium of regulations applicable to the activity at the national and provincial levels. (See "Applicable legal framework" for a list of laws).

International Labour Organization (ILO)

Garruchos is committed to complying with the ILO conventions ratified in the country, the eight ILO core (fundamental) conventions and those that have an impact on forestry operations and practices, in order to ensure that workers have fair wages, safe working conditions and respect for their rights as human beings and workers.

Argentina has ratified 81 Conventions and 2 Protocols. Fundamental Conventions: 8 out of 8. Governance agreements (Priority): 3 out of 4. Technical agreements: 70 out of 177. Of the 81 Conventions and 2 Protocols ratified by Argentina, 63 are in force, 16 have been denounced, 3 abrogated instruments; None have been ratified in the last 12 months.

Table 7: ILO CONVENTIONS RATIFIED AND NOT RATIFIED BY ARGENTINA

Covenant	Date of ratification	Situation	Type
C29 Forced Labour Convention, 1930	14/03/1950	Ratified	Fundamental
C87 Freedom of Association and Protection of the Right to Organise Convention, 1948	18/01/1960	Ratified	Fundamental
C98 Right to Organise and Collective Bargaining Convention, 1949	24/09/1949	Ratified	Fundamental
C100 Equal Remuneration Convention, 1951	24/09/1956	Ratified	Fundamental
C105 Abolition of Forced Labour Convention, 1957	18/01/1960	Ratified	Fundamental
C111 Discrimination (Employment and Occupation) Convention, 1958	18/06/1968	Ratified	Fundamental
C138 Minimum Age Convention, 1973	11/11/1996	Ratified	Fundamental
C142 Human Resources Development Convention, 1975	15/06/1978	Ratified	List of ILO Conventions Impacting Forest Operations and Practices: FSC-POL-30-401 (2002) EN
C169 Indigenous and Tribal Peoples Convention, 1989	03/07/2000	Ratified	List of ILO Conventions Impacting Forest Operations and Practices: FSC-POL-30-401 (2002) EN
C182 Worst Forms of Child Labour Convention, 1999	05/02/2001	Ratified	Fundamental
C155 Occupational Safety and Health Convention, 1981.	13/01/2014	Ratified	List of ILO Conventions Impacting Forest Operations and Practices: FSC-POL-30-401 (2002) EN
C97 Migration for Employment Convention (Revised), 1949.	-	Not ratified	List of ILO Conventions Impacting Forest Operations and Practices: FSC-POL-30-401 (2002) EN
C131 Minimum Wage Fixing Convention, 1970.	-	Not ratified	List of ILO Conventions Impacting Forest Operations and Practices: FSC-POL-30-401 (2002) EN
C141 Rural Workers' Organizations Convention, 1975	-	Not ratified	List of ILO Conventions Impacting Forest Operations and Practices: FSC-POL-30-401 (2002) EN
C143 Migration for Employment (Supplementary Provisions) Convention, 1975	-	Not ratified	List of ILO Conventions Impacting Forest Operations and Practices: FSC-POL-30-401 (2002) EN

Source:
https://www.ilo.org/dyn/normlex/es/f?p=NORMLEXPUB:11200:0::NO::P11200_COUNTRY_ID:102536
The fundamental conventions of the International Labour Organization. First edition 2002 Second printing 2003.
List of ILO Conventions Impacting Forest Operations and Practices: FSC-POL-30-401 (2002) ES.

REFERENCE DOCUMENTS

Garruchos contemplates the recommendations of guides and manuals considering that they make up the best information available:

- Guide to Good Forestry Practices for the Province of Corrientes / José Edgar-do Saiz; Carlos Vera Bravo; Claudia Verónica Luna. - AFoA–INTA-UNNE. 1st ed. Corrientes: Ediciones INTA, 2014.
- Safety and health at work in forestry: ILO code of practice – Geneva, International Labour Office 1998.
- Guide on Safety in the Use of Agrochemicals - Geneva, International Labour Office 1993.
- Generic Guide for the Identification of High Conservation Values – Proforest, October 2013.
- Generic Guide for the Management and Monitoring of High Conservation Values – Proforest, September 2014.
- IUCN Red List V3.1 Categories and Criteria
- Manual of Good Practices for Cargo Transport. SRT 2016.
- Manual of Good Practices in Forestry Activity. SRT 2017.
- SRT Manual of Good Practices Forestry Activity

19 EXPANSION OF FOREST HERITAGE

Prior to the incorporation of new properties intended to be afforested, an evaluation of them is carried out by a technical team.
Upon receipt of property offers, on-site inspections are carried out, where the forest use potential of the property to be acquired is defined, based on a preliminary analysis of the suitability of the soils and the sensitive features of the landscape. As an element of judgment, information from satellite, aero photographic and cartographic surveys is used.

20 OTHER ACTIVITIES

As additional activities of the Group, it is worth mentioning that since 2004, in Puerto Valle Establishment, the captive breeding of native caiman species (caiman and black caiman) began, with a program of return of part of the born offspring to the natural environment, giving excellent results to date.
The commercialization of hides and meat is foreseen, thus generating an additional income for forestry activity.
In addition, the Puerto Valle Hotel has been operating in the same property since 2007, they are of the high-end Boutique Hotel type, with a proposal for rest and enjoying the environmental beauties.
Another of the activities carried out by Garruchos in its productive establishments is the cultivation of yerba mate *Ilex paraguariensis*. It currently has 200 ha of this crop.

MONITORING

The monitoring system is used to monitor the environmental, social and economic monitoring of forest management. Monitoring allows us to know the state of the

resources over time and provides us with information on the effects that operations have on them and the effectiveness of the prevention and mitigation measures taken. The results allow you to adjust and apply continuous improvement of activities.

Environmental

The studies of Environmental Characterization of Forestry Projects (March 1999) and the Environmental Impact Assessment of Forest Properties (February 2000) provided guidance on environmental monitoring activities that serve as a guide for forestry operations. They were carried out by institutions and third parties with recognized experience in the field. Since 2016, environmental surveys and monitoring of HCVs have been carried out with CECOAL-CONICET.

Environmental monitoring is aimed at evaluating the state of the environment directly through measurements of environmental variables such as water, fauna, vegetation, soils, with key indicators, and indirectly through the monitoring of the implementation of good forestry practices in operations.

Direct measurements

- ✓ Water quality monitoring: consumption, fish habitat, phytosanitary products.
- ✓ Soil monitoring: erosion, fertility.
- ✓ Fauna Monitoring: Mammals, birds, amphibians, reptiles.
- ✓ Participatory Wildlife Monitoring.
- ✓ Flora Monitoring: Grassland, Yatai, native forest in mogotes, invasive exotics.
- ✓ HVC Monitoring

Indirect measurements

- ✓ Incident Logging and Reporting
- ✓ SAC Registration and Management (Operating Procedures)
- ✓ Waste management
- ✓ Hydrocarbon management
- ✓ Spill Management
- ✓ Agrochemical management
- ✓ Appropriate maintenance techniques and roadworks
- ✓ Maintenance of conservation areas
- ✓ Billboard Maintenance
- ✓ Impact of activities
- ✓ Waste
- ✓ Fire outbreaks

Social

Social monitoring is aimed at monitoring the working conditions of the operators, their safety, formality of employment, feeding conditions, implementation of good forestry practices through operational procedures. The link with the community is monitored by monitoring compliance with the social management schedule.

Through internal audits of the work fronts, the fulfillment of the work is regularly checked in the field in a safe manner and according to operating procedures. The work fronts,

machinery, support vehicles and camps are checked. The basic requirements are determined by the operating procedures and deviations in their compliance are the reason for corrective action requests with a predetermined compliance deadline. Operators' personal incidents are monitored by recording the incident form and daily reports.

Service providers are monitored through a platform called EHS. It verifies monthly compliance with their obligations in social charges, F931, SVO, ART, pre-employment and periodic exams, salary receipts, delivery of work clothes and PPE, training plan, vehicle and machinery insurance.

More information see the monitoring and social management plan.

Economics

Economic and financial monitoring is one of the fundamental pillars to evaluate the viability and economic sustainability of Garruchos. The profitability and rate of return of plantation management are the main indicators used. Monthly and annual reports are made with economic and financial analyses, where costs, prices and profits are considered.

21 SCIENTIFIC AND TECHNICAL ADVANCES

2022: national report. Estimation of soil organic carbon stocks with forest plantations and other land uses, in different regions of Argentina.
2020: Forest Windbreak Curtains and Agrochemical Drift Buffers (INTA)
2019: Strategic Plan for Forestry and Industrial Forestry Argentina 2030
2018: Forestry Seminar (INTA)
2018: water consumption of afforestation (CFCN)
2018: Wildland Fire Fighter (CMF) Manual
2018: Biological Pest Management (AFOA)
2017: Manual of Good Forestry Practices (AFOA)
June 2017: Draft FSC National Forest Management STD for Argentina version 3.
May 2017: CLT Bulletin - Wildlife Restoration in Iberá.
March 2017: Advances in the biological control of the "eucalyptus gall wasp".
March 2017: Regeneration of woody plants under isolated shrubs in a sector of the Iberá estuaries, Corrientes, Argentina, ethnoecological implications Héctor A. Keller 1, Santiago J. E. velazco, 2 & Ernesto R. Krauczuk 3.
July 2016: Draft of the FSC National Forest Management STD for Argentina version 1.
April 2016: Technical Report N° 11 Maimonides, bibliography p. 28.
April 2016: Ariel Caro (Dirección de Rec. Forestales Corrientes) Callophyllum brasilense-new record for the Argentine flora
January 2016: CLT Bulletin - Restoration of Fauna in Iberá.
November 2015: Claudia Luna, Institute of Botany of the Northeast (IBONE), Laboratory of Applied Biotechnology and Functional Genomics, Associate Researcher CONICET, publications of Brazilian Callophyllum
January 2015: Krauzuk: aleuas uruguayensis
January 2015: Krauzuk: on the presence and conservation of Ciathea delgadii
Agosto 2015: Krauzuk: New records of ciatrea atrovirens
See Maimonides reports.

22 REVIEWS

Revisions to this Management Plan will be made when changes occur in the heritage area due to the purchase or sale of properties, when modifications occur in the industrial supply needs, when environmental, social and economic changes occur. Whenever Management approves a change in Company Policy or at least every 5 years. The reviews will be carried out by the head of the Forest Environment, Health and Occupational Safety Area and approved by the Forest Management.
Revisions to the Declaration of Principles and the Safety, Occupational Health and Environment Policy will be carried out when Management approves a change in the Company's Policy or at least every 5 years. The reviews will be carried out by the Senior Management of Garruchos.

23 INFORMATION SAFEGUARDING

All documentation and information related to the project's forest management is stored for at least 5 years on paper and digitally. By AFIP provisions, paper sales remittances are stored for a period of 10 years. Garruchos has a central archive in which the administrative documentation of one year old is located. A second archive stores the administrative historical documentation for a period of 10 years.
Digital information is safeguarded on a dedicated server through magnetic tapes that are stored in the Garruchos fireproof safe. The safeguarding operation is carried out in its entirety once a week every Friday, and incrementally from Monday to Thursday.

24 MODIFICATIONS TO THE LATEST VERSION

The following version history refers to the main forest management plan of Garruchos S.A., of which this document is an adaptation for project VCS ID 5202.

Version	Effective Date	Description and/or Modified Items
1.0	30/04/2005	Original Issue
2.0	01/10/2005	3.7 Forest Species and Yield Estimation 9 REVIEWS 10 MODIFICATIONS TO THE LATEST VERSION 11 REFERENCE DOCUMENTS Annex 1 Declaration of Principles Annex 2 Safety, Occupational Health, and Environmental Policy Annex 4. Lot Location Plans
3.0	01/07/2009	1. GENERAL INFORMATION 2. COMPANY BACKGROUND Figure 2. Location of Garruchos properties in Argentina 3.2 Land use 3.4.1 Plant Production 3.4.3 Preparation of the land for planting 3.4.4 Implementation 3.4.5 Plantation maintenance 3.4.6 Interventions: Pruning and thinning 3.8 Estimation of Timber Production Figure 4. Distribution of species by age, for the Uruguay River area Figure 5. Distribution of species by age, for the Paraná River area 11. REFERENCE DOCUMENTS ANNEX0 1. DECLARATION OF PRINCIPLES

Version	Effective Date	Description and/or Modified Items
		ANNEX 2. SAFETY, OCCUPATIONAL HEALTH AND ENVIRONMENTAL POLICY ANNEX 3. Organizational chart of Garruchos (Garruchos S.A. and Forestal Aguara Cua S.A.) ANNEX 4. Pests and Diseases with economic impact on Plantaciones de Garruchos S.A. and Forestal Aguara Cua S.A.
3.1	03/05/2010	2. Company Background 3.2 Land Use 3.4.6 Interventions: Pruning and thinning 3.9 Conservation Areas 4.1 Social Aspect 4.2 Environmental context 4.2.1 Conservation Measures
3.2	02/01/2011	1. General Information 3.4.2. Use of Agrochemicals. 3.4.6 Interventions: Pruning and thinning 3.7 Forest Species and Yield Estimation
3.3	01/10/2012	All the items of the Management Plan and its Annexes 1, 2, 3 and 4 were reviewed and adjusted in general
3.4	01/10/2013	Of form and updating of values.
3.5	01/10/2014	Of form. Expansion of environmental and social aspects, new operating procedures, updating of values, maps, list of laws, administrative organizational chart,
3.6	1/09/2015	Company organizational chart, planted areas, monitoring results
3.7	1/01/2016	Statement of principles and policy of the Garruchos Group.
3.7	1/05/2016	Organizational chart of the company, planted areas, monitoring results, exclusion of Establecimiento San Ignacio. Chemical use strategy.
3.8	30/03/2017	Definition of area of influence (Social Aspects). Update of the list of phytosanitary products, yield sheets, progress of results of economic, environmental and social monitoring. Technical and scientific advances.
3.9	June 2017	Technical and scientific advances. Results of economic, environmental, and social monitoring Results of monitoring, performances. Organization chart.
3.10	May 2018	AVC. Applicable law. Scientific Advances. Social monitoring of operators and contractors 2017. Community social monitoring. Incidents 2017.
3.11	April 2020	Summary. Surface tables. Maps. Heritage. Execution stage. Safety and environmental care, common to all activities. Preparation of the land. Restrictions on the high and medium voltage line strip. Applicable law. Preparation of the land. Plantation. Weed control. Environmental. Conservation programme for rare and/or threatened species. Social Personnel operators, list of POs. Socioeconomic context. Reference documents. Use of phytosanitary products.
3.12	August 2021	Surface Tables. Phytosanitary products. Fire organization chart. Pomera's organizational chart. More Forests More Future Program. Overall Review
3.13	August 2022	Administrative status. Summary. Surfaces and Surface Tables. Pomera's organizational chart. Publications. Annex I Declaration of principles. General review.

Version	Effective Date	Description and/or Modified Items
3.14	August 2023	Summary. Administrative Status. 1. General Information. 2 Background. 4. Objectives. 5.2 Equity. 9. Carbon project. 11.6 Thinning 20. Industry and products. 21.2 Conservation areas. 21.3 Areas of high conservation value. 23.1 Organizational structure. 23.2 Governing Law.

25 REFERENCE DOCUMENTS

UNNE. 1999. Environmental characterization of Shell-CAPSA Forestry Projects. March 1999.
UNNE. 2000. Environmental Impact Assessment of Shell-CAPSA Forest Properties. Est. Garruchos. February 2000.
UNNE. 2000. Environmental Impact Assessment of Shell-CAPSA Forest Properties. Puerto Valle Est. February 2000.
UNNE 2000. Environmental Impact Assessment of Shell-CAPSA Forest Properties. Ciriaco and Manantiales Est. February 2000.
CECOAL 2000. Environmental Impact Assessment of Shell-CAPSA Forest Properties. Est. La Palmita December 2000.
CECOAL 2000. Environmental Impact Assessment of Shell-CAPSA Forest Properties. Est. Uriburu December 2000.
CECOAL 2000. Monitoring of Shell Capsa's forest properties. December 2000.
CECOAL 2005. Environmental Impact Assessment of the Pindó Guazú Project, October 2005.
FONTAN, RAUL. 2009. Environmental Impact Assessment of the Aguara Cua Project. 2009
FONTAN, RAUL. 2009. Environmental Impact Assessment of the Yaco-vi Project. 2009
ZULETA, G.A., M.A. HOMBERG, A. Faggi, M.G. Arias, J.M. Meluso, G. Lanusse, N. Rey, D.G. Schell, V.E. Capmourteres, C. Falgueras and M.T. Junges. 2010. Biodiversity conservation and environmental management in forest plantations in Garruchos, Corrientes. Technical Progress Report N° 2. 92 pp.
ZULETA, G.A., M.A. HOMBERG, A. Faggi, M.G. Arias, J.M. Meluso, G. Lanusse, N. Rey, D.G. Schell, V.E. Capmourteres, C. Falgueras and M.T. Junges. 2010. Biodiversity conservation and environmental management in forest plantations in Garruchos, Corrientes. Technical Progress Report N° 3. 160 pp.
BUSTOS, MISAEL. Social Diagnosis. 2010

26 ANNEXES

26.1 ANNEX 1: DECLARATION OF PRINCIPLES

DECLARATION OF PRINCIPLES

Pomera maderas through its companies **Garruchos S.A**., **Forestal Aguara Cua S.A.** and **Garruchos Forestación S.A.**, located in the Argentine Republic, declares its commitment to manage its forestry activities in accordance with the principles of Sustainable Forest Management and the Forest Stewardship Council® (FSC),® committing to:

- Manage their forest resources in a way that generates economic profitability for their shareholders, without compromising the current and future productive capacities of the ecosystems that sustain them.
- Conserve biological diversity by protecting wildlife and native vegetation within their natural habitats.
- Contribute to the improvement of the material and cultural needs of their forest workers, their families and neighbouring communities.
- Ensure that companies that provide forestry services adhere to and comply with these principles.
- Seek continuous improvement in the overall performance of the organization.
- Comply with FSC®'s core labor requirements.

Gumercindo Irala
Forestry Manager

Misiones, Posadas, January 1, 2022
Version 3.6

26.2 ANNEX 2: SAFETY, OCCUPATIONAL HEALTH AND ENVIRONMENT POLICY

SAFETY, OCCUPATIONAL HEALTH AND ENVIRONMENTAL POLICY

Pomera Maderas is committed to preserving the safety and health of its personnel, contractors, neighboring communities and to take care of the environment in which it develops its industrial forestry activities, from the implementation of its forests to the commercialization of its finished products.
For this reason, its Management considers this policy as an integral part of its business and a priority throughout the management line, ensuring its dissemination, understanding and compliance at all levels of the Organization.
To this end, it declares:

1. Comply with all applicable legislation, requirements agreed with Stakeholders, and any other commitments voluntarily assumed.
2. Implement Management Systems that ensure compliance with this Policy and that include programs for: pollution prevention; reduction of occupational risks and improvement of work environments; continuous improvement of their performance.
3. Promote the Health and Quality of Life of its employees.
4. Evaluate the environmental impacts and risks to Occupational Health and Safety in the new projects, investments and businesses that it undertakes.
5. Establish, within the framework of this Policy, Objectives, Improvement and Goals measured within its Management Programs.
6. Ensure that all employees and contractors receive appropriate training and are competent to fulfill their obligations and responsibilities.
7. Provide the necessary resources for compliance with this Policy and the established Objectives.
8. Ensure adequate resources and planning to respond to emergencies in order to protect people and facilities in critical situations, minimizing their consequences.
9. Periodically assess the health status of its employees and contractors to identify and control work-related health risks in a timely manner.

Gumercindo Irala
Forestry Manager

Misiones, Posadas, January 1, 2022
Version 3.6

26.3 ANNEX 3: TECHNICAL SPECIFICATIONS FOR THE LAYING OF HIGH AND MEDIUM VOLTAGE OVERHEAD LINES

Conditions according to the applicable legal framework:

Technical Specifications T-80

1) In the entire crossing of the affected property, and in an area whose width is defined by a formula (Detailed in Technical Specification T-80), the existence of any type of dwelling will not be allowed. The width of this strip, called *the safety zone*, has its axis coinciding with that of the line. The value of the minimum horizontal safety distance is obtained from Table No. 1.

(2) In rural areas, two adjacent strips *are also defined*, one on each side of the security zone, the width of which is indicated in Table No. 2. In these strips, restrictions on ownership will be established, allowing the construction of single-storey homes, without accessible terraces or protruding balconies.

3) Within the total area defined in points 1 and 2 above, the holder of the easement may authorize the existence of any other type of construction (sheds, mills, tanks, etc.).) if, in its sole opinion, it does not affect the safety of the service and facilities of the line.

4) Plantations of trees, reeds, etc., will be allowed over the entire easement area, up to a height such that the free distances of Table No. 3 are met. The burning of reeds, weeds, etc., will not be allowed within the easement area.

5) Where there is a danger of falling trees, those that in their total fall or of any of their parts may pass at a distance, with respect to non-declined conductors, less than that indicated in Table No. 4, shall not be permitted.

Table 9

DISTANCIA HORIZONTAL MINIMA DE SEGURIDAD d

Tensión (kV)	Distancia d	
	Zona Rural	Zona Urbana (1)
13,2	3,00	4,20
33	3,00	4,20
66	3,00	4,20
132	3,15	4,35
220	3,75	4,95
500	5,60	6,80

(1) Los valores de esta columna disminuidos en 1,20 m deben además verificarse como distancia mínima horizontal entre conductor declinado y parte más saliente de la edificación (balcones, aleros, marquesinas, etc.).

Table 8

FRANJAS ADYACENTES PARA ZONA RURAL

Tensión (kV)	Ancho e (m)
13,2	A definir en cada caso particular
33 (aislador a perno)	A definir en cada caso particular
33 (aislador a susp.)	3,00
66	4,00
132	5,00
220	6,00
500	8,00

Table 11

DISTANCIA ENTRE CONDUCTORES Y ARBOLES
(Distancia en metros)

Tensión (kV)	Con conductor no declinado		Con conductor declinado
	Arboles bajo la línea	Arboles al lado de la línea	
13,2	2,50	2,50	0,90
33	2,50	2,50	0,90
66	2,50	2,50	0,90
132	2,65	2,65	0,90
220	3,25	3,25	1,50
500	5,10	5,10	3,25

Table 10

DISTANCIA POR CAIDA DE ARBOLES A CONDUCTOR NO DECLINADO

Tensión (kV)	Distancia (m)
13,2	1,00
33	1,00
66	1,00
132	2,00
220	3,00
500	4,00

Resolution 382/2015 (COMPLEMENTS T-80)

1) Mandatory Restrictions

Within the established range, the following facilities/activities are prohibited:

a) All types of constructions, installations and/or assemblies.

b) Sports and leisure fields in general.

c) Carrying out ground movements that put or may put at risk the stability of structures, hinder maintenance tasks or reduce safety distances for drivers.

d) The planting of trees or shrubs that in their maximum state of growth exceed the height of FOUR METERS (4.00 m.).

e) The burning of stubble, bushes, crops, and/or any other material, in the easement strip and in its vicinity.

(f) The handling or transfer of flammable liquid or gaseous or volatile fuels.

g) Parking lots for vehicles; Cemeteries; swimming pools; artificial lakes and garbage dumps.

(h) Explosive blasting of land

(i) Aerial fumigation

j) Carrying out activities or stockpiling materials that reduce the distance from the conductors of the line or cause contingent risks such as fire, explosions, blasting, etc.

k) Traveling with vehicles or mobile equipment that exceed the net height of FOUR POINT FIFTY METERS (4.50 m.).

2) Only with the written authorization of the holder of the easement shall the following be permitted:

I) Install sprinkler irrigation systems

m) The crossing of ducts of any type and/or the installation of other high, medium or low voltage lines provided that ENRE Resolution No. 37/2010 is complied with

n) The use of electric wiring or oxherd wire.

3) Change of land use in Administrative Easements of Electroduct already constituted.

o) In the event that a Municipality or agency authorized for this purpose authorizes the change of land use in a property with an Administrative Easement of Electroduct already constituted, for example, from Rural to Urban (gated communities, country clubs, urbanizations, etc.), the owner of the High Voltage Line (LAAT) must verify compliance with the public safety regulations in force. In the event that the LAAT does not comply with them in relation to the new cadastral situation, it must inform the owner of the land of the situation and adapt the LAAT for compliance. The concessionaire must also report the situation to the authority that ordered the change of land use, informing it that it must bear the cost of adapting the line to the regulations applicable to the new situation of land use.

4) Mandatory restrictions established for the safety of the line in the area near the security strip.

p) Where there is a danger of falling trees or plant species, masts, mills, signs, chimneys of all kinds, etc., it shall not be permitted that in their total fall or of any of their parts they may pass at a distance from the declined conductors less than ONE (1) meter for voltages greater than 13.2 kV and up to 66 kV, TWO (2) meters for 132 kV voltages, THREE (3) meters for 220 kV voltages, and FOUR (4) meters for 500 kV voltages