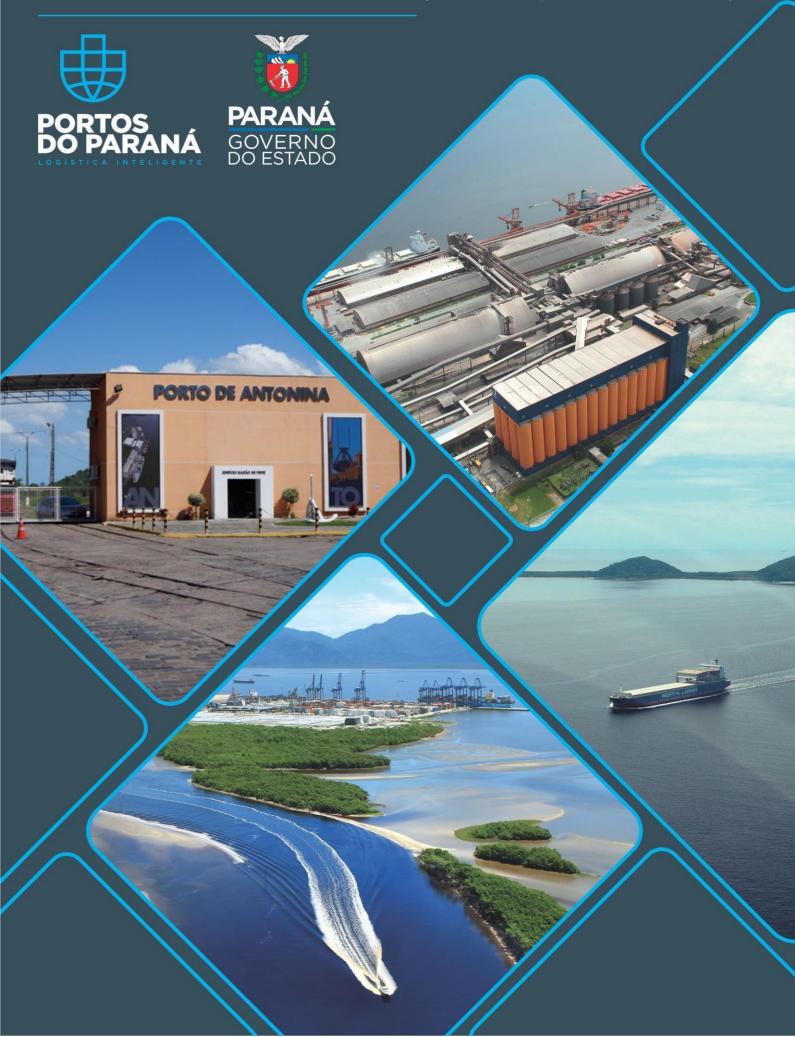
Manual do SGI (SGA/SGSST)



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Manual of the Integrated Management System (SGI) Environmental (SGA) and Safety and Health at Work (SGSST)

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1 PRESENTATION

This Handbook presents and describes the Integrated Management System (IMS) for the Environment (EMS) and Occupational Health and Safety (OH&S). The guidelines described here seek to guide the continuous improvement of the company's relationship with the environment and society.

By establishing an integrated management policy, associated to objectives and goals, we seek to improve the efficiency of the company processes, complying with legal requirements and zeal for the environment and occupational health and safety of workers and other interested parties. The IMS Handbook is applied to all sectors of the company, aiming at a collective commitment to socio-environmental responsibilities in all procedures carried out by Portos do Paraná.

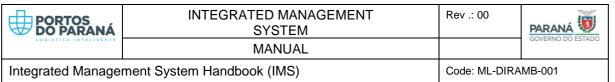
2 GOAL

This Handbbok aims at documenting the scope, policy and guidelines of Portos do Paraná's IMS and at describing the main systems for continually improving the adequacy, sufficiency and effectiveness of this IMS.

3 PORTOS DO PARANÁ CONTEXT AND IMS'S SCOPE

Portos do Paraná in a public company which belongs to the State Government of Paraná, and it is responsible for managing the public ports of Paranaguá and Antonina considering the handling of cargo and passengers. As Porto Authority, Portos do Paraná is also responsible for regulating and supervising port operations, considering legal requirements.

As presented in the figure 1, the inner context of Portos do Paraná is related to its aims as a public company, comprising administrative processes and the maintenance/modernization of the port infrastructure, under the control of the IMS. The external context comprises port operational processes, which the IMS influences through regulation and inspection.



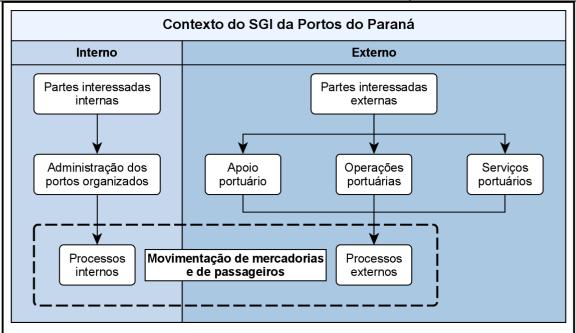


Figure 1 - Context of the Ports of Paraná in which the SGI is inserted.

Within the scope of the integrated management system, the term "port agents" is used to refer to the Port Authority and other authorities that act in the port area; the labor management agency (OGMO – stevedoring company); port operators; service providers; professional class unions; among others responsible for one or more specific duties in the port activity (Antaq Resolution no 2239/2011).

3.1 Inner context

Portos do Paraná (Administration of the Ports of Paranaguá and Antonina/APPA) is a state-owned company, subordinated to the Secretariat of Infrastructure and Logistics, with a delegation agreement with the Federal Government. Portos do Paraná acts as a port authority, in accordance with the Federal Law No 12.815/2013, having jurisdiction over the areas of the organized ports of Paranaguá and Antonina. The main activities of Portos do Paraná are:

 Supervise, control and regulate port activities in the Paranaguá and Antonina port complex;

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- Ensure the safety of navigation, through systems and maintenance works;
- Monitor the environment in which it operates, taking care of waste and providing resources for the defense of fauna and flora, in case of accidents;
- Ensure road and rail accesses to the port terminals;
- Regulate the services provided at the ports by cargo and terminal operating companies, agents, towing and mooring companies, among others;
- Manage port development, through the Plan for Development and Zoning of the Organized Port of Paranaguá and Antonina;
- Facilitate the installation of new activities, industries, services or terminals, attracting new business, with strategic actions;
- Manage conventional tariffs, as well as tariffs for the use of maritime infrastructure, docking, operation and facilities of the Ports of Paraná, in addition to other revenues;
- Manage the contracts of the leased areas and regulate the activities of the leasing companies;
- Provide and qualify the staff for these activities.

Considering the corporate organization of Portos do Paraná, it is managed by an administrative board and an executive board. Seven executive boards comprise the executive board of Portos do Paraná, in addition to the Presidency, namely: Commercial Board (Diremp), Financial Administrative Board (Dirafi), Legal Board (Dijur), Engineering and Maintenance Board (Demant), Environment Board (Diramb) and Port Operations Board (Dioport). The figure 2 presents the institutional organization chart of Portos do Paraná, with a focus on the management and coordination of Diramb, which is responsible for the management and implementation of the IMS.

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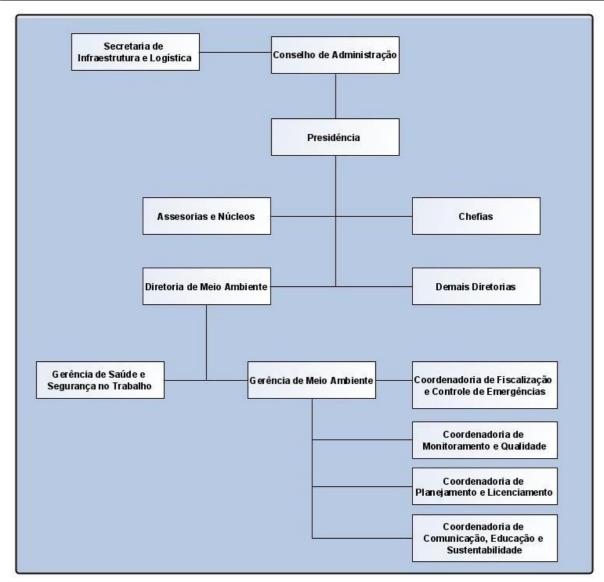


Figure 2 - Institutional organizational chart of Portos do Paraná facing the SGI.

Portos do Paraná's mission, vision and values are:

- Mission

Administer, develop and supervise the activities of Ports of Paraná, offering quality solutions to its stakeholders, providing logistical excellence, competitiveness and innovation; providing safe and efficient services and infrastructure to its customers and users, promoting regional and national economic development with socio-environmental responsibility.

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- Vision

Being recognized as the Port Authority reference in sustainability, socioenvironmental responsibility, efficiency, competitiveness and integrity, in order to make the ports of Paraná the best port complex in Brazil.

- Values

Transparency and ethics, valorization of human capital, safety, efficiency, socioenvironmental responsibility, quality in service provision. These values contribute to the execution of efficient management focused on providing intelligent logistics.

3.2 External context

In the current management model, the port authority is responsible for the administration of the Paranaguá and Antonina ports and for providing the necessary structure for cargo handling activities. Thus, the company maintains, as a representative of the government, the entire waterway access infrastructure, evolution basin, berths, road, rail and inland areas of the ports of Paranaguá and Antonina, while the private sector is responsible for the other structures, such as equipment, warehouses and labor, and port operations. In the case of leasing companies, they are responsible for maintaining their area of use. In this sense, the external context of the IMS applies to port agents defined inTable 1.

Table 1. Definition of port agents in the external context of the IMS of Portos do Paraná.

Port agents in the external context
Tenants; authorizing agents; assignee; and port operators (including associations) of public port facilities ¹
Other port operators operating in the common areas of organized ports
Stevedoring Management Group (OGMO) and professional unions
Cargo transportation cooperatives, carriers and autonomous drivers
Railway operator (Rumo)
Vessel owners, ship owners or agents (shipping agencies);
Port support companies and port service providers
Electricity distribution concessionaire (Copel)

¹Transient port management model Tool Port / Landlord Port (adopted by the Brazilian government for the exploitation of its port system).

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3.3 Scope of the IMS of Portos do Paraná

The IMS of Portos do Paraná comprises all activities related to the regulation and administration of port operations, applying directly to the activities performed by the company's employees, its contractors and outsourced agents, but also regulating control and security measures of the leasing companies, operators and other port agents connected to the ports of Paranaguá and Antonina.

4 INTEGRATED MANAGEMENT SYSTEM POLICY

Portos do Paraná seeks excellence in port administration and its activities are carried out aiming at the maintenance of:

- Human health and safety, promoting a safe environment through hazards elimination and risk reduction;
- 2. The commitment to zeal for the environmental quality of its surroundings;
- 3. Port operations with good performance;
- 4. The compliance with the legal requirements related to the environment and occupational health and safety;
- 5. The participation of port agents and workers in the continuous improvement of the IMS.

5 AUTHORITY AND RESPONSIBILITY

The continuous improvement of the IMS is the responsibility of the Senior Management and the Environment Department of Portos do Paraná. The specific functions are detailed below.

5.1 Senior Management

The senior management representative corresponds to the CEO of Portos do Paraná, whose responsibilities, within the scope of the integrated management system, are:

 Ensure that the IMS policy is aligned with the company's strategic direction and business processes;

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- Determine the necessary resources for the maintenance and improvement of the implemented IMS;
- Approve budget compliance, allocating resources to issues that involve meeting legal requirements, as well as minimizing health, safety and environmental risks and impacts;
- Approve procedures, instructions and other documentation related to the IMS that guarantee this culture in the company;
- Approve management objectives, goals and programs that are in accordance with the company's environmental policy, nature and scale;
- Acknowledge the results of the survey of significant environmental aspects
 of the company and the faithful compliance with the legislation applicable to
 the activities;
- Provide guarantees for the IMS to achieve the desired results, promoting its continuous improvement in whatever depends on its decisions;
- Promote a culture in the company that supports the results intended by the IMS.

5.2 Environment Board

The Environment Board (Diramb), through the Environment Management Sector, is responsible for coordinating, monitoring and inspecting activities related to the environment in the port area and its surroundings, as well as activities that are potentially polluting or under its management. Through the Occupational Safety and Medicine Department, Diramb is also responsible for managing and inspecting aspects related to occupational safety and employee health. Therefore, the Environment Director is responsible for:

- Acting as senior manager for environmental and occupational health and safety matters;
- Representing the company's top management in matters related to the IMS;
- Identifying, registering and updating the environmental legislation applicable to the activities developed in the company;
- Advising, review and approve the preparation of documents regarding the implementation of the IMS in the company;

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- Making the necessary resources available for the administration of the IMS;
- Guaranteeing company employees conditions to report incidents, dangers, risks and opportunities related to the IMS, ensuring a consultation and participation process for all port agents;
- Deliberating on the control of proposed corrective and preventive actions;
- Managing the environmental, health and safety programs linked to the IMS.

5.2.1 Environment Management

The environment manager is responsible for managing, implementing and updating the integrated management system and the procedures associated to it, along with the team under his guidance. The manager is also responsible for:

- Managing and ensuring the environmental procedures of the ports of Paranaguá and Antonina;
- Supervising the progress of environmental licenses (terms, conditions, specific conditions);
- Managing audition processes in the environmental field;
- Monitoring deadlines and delivering reports to environmental, supervisory and control bodies and other intervening bodies;
- Monitoring the activities carried out by the companies hired to carry out actions in the environmental area;
- Elaborating, managing and supervising the environmental management process of the port, comprising programs and monitoring of the physical, biotic and socioeconomic environment;
- Managing the implementation of the environmental education and training process for people who have a direct or indirect relationships with the port activities:
- Proposing to the Environment Board rules and procedures for the environmental adaptation of port activities, and review existing ones;
- Managing preventive and corrective actions aimed at the preparation and execution of plans for emergency situations;

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- Carrying out the response of notifications, assessments and letters from the control bodies;
- Controlling, monitoring and communicating activities with potential risks to the environment;
- Analyzing the causes of non-conformities, record the results of this analysis and propose corrective and preventive actions;
- Complying with and enforcing the laws applicable to the its work area, as well as internal regulations;
- Managing and controlling the work of the other employees under its management.

5.2.2 Occupational Health and Safety Management

The occupational health and safety manager is responsible for managing, implementing and updating the integrated management system and the procedures associated with it, together with the team under his guidance, and is also responsible for:

- Preparing, implementing and monitoring the Occupational Safety Programs subject to legal requirements, also coordinating the safety, environment and health dialogues;
- Assessing the conditions of environmental and occupational safety, of the environment and port operations and issue of technical reports, communicating and advising for the treatment of deviations from inspections;
- Implementing technical-operational training programs and security campaigns, covering environmental and occupational aspects, in addition to awareness programs for civil servants and the community regarding exposure to natural, technological risks and security-related issues associated with port operations;
- Performing statistical monitoring of the occurrence of incidents and deviations and the respective causes and consequences for the evaluation and adoption of control measures, promoting meetings to evaluate indicators;
- Issuing technical advice on managing changes in technology, installation and people;

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- Ensuring the proper functioning of fire-fighting equipment and monitoring of risk agents, following the actions necessary to maintain the fire-fighting system;
- Propose to the Environmental Board rules and procedures for work safety in port activities, carrying out auditions and issuing opinions and technical reports;
- Managing, preparing and monitoring the Action Plans for legal nonconformities in the area of Occupational Safety;
- Managing and carrying out inspections in the areas of the Organized Ports, regarding compliance with appropriate Occupational Safety rules and procedures;
- Managing preventive and corrective actions aimed at the preparation and execution of plans for emergency situations;
- Ensuring the implementation and maintenance of specific accident prevention programs;
- Implementing and coordinating the periodic integration of port employees, contractors and visitors;
- Proposing to the Environment Board rules and procedures related to safety;
- Ensuring the execution of actions related to emergency plans, under its management;
- Managing and controlling the work of other employees under its management;
- Identifying and correcting non-conformities.

5.3 Other Boards of Ports of Paraná

The other Directors of Portos do Paraná must work together with the Environment Board to assist in the execution and implementation of the guidelines defined in the IMS and/or in the company's environmental, safety and health plans.

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6 PLANNING

6.1 Risk Assessment and IMS Opportunities

Portos do Paraná seeks compliance with legal and other requirements related to the environment, safety and occupational health. Legal requirements and other requirements applicable to the company are continuously identified and updated once a month. In addition, a digital filing of the new requirements or their updates are made in a public digital folder available to the employees of the company's Environment Department.

The company aims to ensure compliance with legal requirements to ensure the quality of environmental licensing procedures and occupational safety in areas under its responsibility, and to guide the activities of port agents. For this, it performs the identification and registration of risks and opportunities aiming at a continuous improvement in results, according to the specific risk assessment matrix. The guidance for identifying and registering IMS risks and opportunities is presented in PO-DIRAMB-01.

6.2 IMS objectives and goals

The IMS objectives and goals are established to maintain and continuous improvement of the IMS performance by the Environment Board (Diramb), represented in the figures of the Environment Director, the Environment Manager and the Occupational Health and Safety Manager. The IMS's objectives and goals are presented in the Institutional Environmental Agenda of Portos do Paraná.

The objectives and goals are monitored by the company through a series of environmental monitoring programs, which result in monthly control reports and annual reports to the regulatory body. These results are communicated and updated mainly through a Social Communication Program, carried out by a contracted company, and by the Communication Sector (Asscom) of the company, which performs the interface with workers, civil society and other interested parties.

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7 IMS SUPPORT

7.1 IMS resources

The allocation of resources to the IMS is executed by the President of Portos do Paraná. The resources destined for the execution of the system are generated by means of port fees charged for operators and by the leasing of port areas.

Its own human resources in its own physical structure, the Dom Pedro II Building, where the team works, execute the IMS processes. In addition, the IMS is structured by a base of emergency care for environmental emergencies (Environmental Protection Center, located in the port area), structured with its own equipment for specialized services and with full-time staff, in accordance with the established in the Emergency Plans for the ports of Paranaguá and Antonina.

7.2 Competence

The professional functions and competences required by the IMS of Portos do Paraná are structured by the institutional organization chart and by the orientation of the company's positions, which guide the professional qualifications required for each function.

The qualifications and skills of employees of the contracted companies are established in the contracting/bidding processes, according to requirements listed in the Reference Terms (TR) of each contract. The qualifications and competences are raised according to the needs of the IMS.

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7.3 Communication

Portos do Paraná's communication is guided by the Integrated Communication Policy, available on the company's website. This is put into practice through various tools, which aim to articulate the information with the company's internal public, and with other agents.

External communication of requirements related to the IMS is the responsibility of the Communication Sector (Asscom) of Portos do Paraná. The public associated with the company and the respective communication tools are listed in Table 2.

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Table 2 - Communication tools from Portos do Paraná.

	Institutio inal email	E-protocol	Appa Web	Paperless Port	Expresso Platform	Social networ ks	Intranet	PCS and other communication actions. Social	Ombuds man	Emergenc y channels	DSMS
Presidency	Х	X			X	Х	Х		Х	Х	
Other Boards	Χ	X	Χ	Х	X	Х	Х		Х	X	
Diramb	Χ	Χ	Χ	Χ	Χ	Χ	Х	Χ	Χ	Χ	Χ
Asscom	Χ				Х		Х	Х		Χ	
Internal public (employees and others)	X	Х			Х	Х	X		X	X	Х
Environmental Consulting		Х				Х		X	Х	X	Х
Emergency response company		Х				Х			Х	Х	Х
Leaseholders		Х	Х			Х			Х	X	Х
Other port service companies		Х	Х	Х		Х			Х	Х	Х
Other port agents		Х	Х	Х		Х			Х	Х	Х
Competent external authorities		Х				Х			Х	Х	
Accident Prevention Internal Comission		Х				Х			Х	Х	Х
External public (local residents and society in general)		Х				Х			Х		

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The tools used in the company's internal communication are:

- E-protocol: standard process management system in all organs of the Executive Branch of the State of Paraná;
- Appa Web: communication and notification portal for operators and lessees;
- Paperless Port (Porto Sem Papel): federal government platform for documentation report related to port operation;
- Expresso Platform: platform that gathers functions of electronic mail, calendar, address book and messenger, used by the entire state public administration.
- Intranet: the company's internal private network available only to Portos do Paraná employees.

In addition to the abovementioned tools, Portos do Paraná also maintains contact with its employees and other port agents interested in messages in the communication application, by the management of a group where the information is replicated exclusively by the Asscom team. The information sent in the application is also sent by e-mail to all employees of Portos do Paraná. Such a tool is important for the company's integrated management system, as it allows quick and efficient communication with all employees.

In addition to the Whatsapp social network, Portos do Paraná also has an Instagram and Facebook profile, where it maintains an active communication system with society. This process is also developed through the Social Communication Program (PCS) and other advertising campaigns carried out by the company.

The company's website, aimed at the internal, external communities and press companies, contains updated information on the context of the company's IMS. Relevant Information from the IMS to the larger state or national context is also sent as a press release with suggestions for the main local and national media.

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Portos do Paraná has an Ombudsman channel connected to the Paraná State system, which aims to serve both its employees and the external community, considering various aspects of communication. The Ombudsman's contacts are disclosed on the company's website.

7.4 Documented Information

The following documents are part of the internal procedures related to the Integrated Management System of Portos do Paraná:

- Integrated Management System Handbook (Environment and Occupational Health and Safety): guiding document for the integrated management system of Portos do Paraná, which defines the integrated policy and guides the establishment of the IMS in the company (the document is available on the website of the Ports of Paraná);
- IMS Regulation: it gathers all the guidelines and rules established by Portos
 do Paraná regarding the management, control, execution and inspection of
 activities / services in favor of the best environmental, health and safety
 practices of workers. This document regulates the activities subject to
 coordination, monitoring and inspection by the Environment Directorate,
 disseminating rules of action in the areas of the Organized Ports of
 Paranaguá and Antonina (the document is available on the website of the
 Ports of Paraná);
- Work Plan: document presented to the Environment Board by companies that intend to carry out services subject to coordination, monitoring and inspection by Diramb within the port area;
- Digital protocols: documents presented to the Environment Board by port agents in compliance with the IMS Regulation;
- IMS operational procedures (POs): Portos do Paraná has a series of POs that guide the execution of the IMS (documents are available on Portos of Paraná website);
- Mandatory programs and reports such as the Environmental Risk Prevention Program - PPRA, the Medical Control and Occupational Health Program - PCMSO, the Technical Report on Environmental Work Conditions - LTCAT and Risk Management Program - PGR: these

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programs and reports aim to develop risk analyzes in order to determine preventive measures related to the reduction and/or mitigation of occupational and operational risks.

In addition to the website, some other platforms and systems are used for the storage and management of information, such as *Porto Sem Papel* and AppaWeb. The company's own digital servers store reports, field records, records, supporting documents and other documents useful to the IMS. Documents linked to the contracted companies are saved on their own servers and later reported to Portos do Paraná. Official documents are available through the *Documentador* platform, which is a tool for managing, storing and retrieving corporate documents from the state government.

8 IMS OPERATIONAL CONTROL

8.1 IMS risks and opportunity approaches

In order to control risks, Portos do Paraná established the IMS Regulation, which specifies the activities subject to monitoring and inspection by Diramb, disseminating rules of action in Paranaguá and Antonina port areas.

The rules determined in the IMS Regulation are continuously monitored, in line with Portos do Paraná's function as a port authority. This service is developed by port and occupational safety technicians from Portos do Paraná staff and by outsourced contractors, who work 24 hours a day. The Inspection Manual 2019 (Portos do Paraná/Antaq) guides the inspection process in the areas managed by Portos do Paraná.

The Lease Management organizes the annual field inspection calendar at the terminals that have a lease contract with Portos do Paraná located within the areas of the ports of Paranaguá and Antonina. Beyond from face-to-face inspections, documentary inspection takes place throughout the year, through the APPAWeb system, in which companies insert the requested documentation for verification by Portos do Paraná. Diramb's team works with the leasing sector both in the field and in documental inspections, in the areas of environment and occupational safety.

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The procedures and routines for the control and inspection of risks and opportunities linked to the IMS were established in the Service Order no 061-2016. The procedures and tools instituted by this Service Order are: the Annual Inspection Program; the Monthly Control and Monitoring Report; daily monitoring with notes of non-compliance; and specific routine inspection. The daily monitoring is carried out through inspection based on an electronic application.

The activities carried out in the port area are also controlled by Portos do Paraná through the accreditation of port risk services. These services are registered with Diramb, prior to the operation, and the requirements of the operation are subsequently inspected.

Risk control is also carried out in the infrastructure maintenance processes, such as electrical, civil/building, road and nautical signaling by the inspection commissions of contracts with outsourced companies through risk identification and document analysis, such as Preliminary Risk Analysis - APR and Work Permit - PT.

8.2 Change management

The Risk Management Program guides Portos do Paraná's change management. The following items are considered a change (either temporary or permanent) in the areas of the ports of Paranaguá and Antonina:

- Any change associated with the list of port operations, port support and port services;
- Any physical change in facilities (administrative or port, leased, assigned or public).

The procedures related to change management are described in item 5.5 of the Portos do Paraná Risk Management Program.

8.3 Acquisition, hiring and outsourcing

Portos do Paraná complies with and enforces the law and concession contracts through a set of tools. Its operating procedures are currently included in lease agreements, operating agreements and, mainly, in the rules and regulations related

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to the IMS, the current versions of which are available on its website.

Among the rules and regulations established by Portos do Paraná for port agents operating in the organized ports of Paranaguá and Antonina, the following stand out:

- Port Operation Regulation;
- SGI Regulation;
- Standards for Pregualification of Port Operators;
- Traffic Rules and Permanence at the Ports of Paranaguá and Antonina;
- Ship Scheduling, Operations and Berthing Regulation.

8.4 Emergency Readiness and Response

Risk and emergencies management is guided by a series of documents that establish incident management procedures, which are:

- Risk Management Plan (PGR): establishes the risk management guidelines;
- Individual Emergency Plan (PEI): aims at planning responses regarding emergency situations involving oil spill;
- Paraná Ports Area Plan (PA): prepared jointly with other companies operating locally. The Area Plan establishes technical and administrative procedures to be adopted to combat incidents and emergencies involving oil spill;
- Emergency Action Plan (PAE): establishes necessary guidelines for acting in emergency situations;
- Mutual aid plan (PAM): aims at the joint action of its members in the response to emergencies. The PO-00-APPA-SGI-17 establishes the criteria for its activation;
- Public Health Contingency Plan: establishes the guidelines for public health emergencies.

8.5 Emergency Coordination

Emergency coordination is carried out by the Environment Director and, in his absence, by the Emergency Inspection and Control Coordinator in collaboration with UASP (Administrative Unit for Port Security). The responsibilities of the emergency coordinator are to:

Manage all actions to be taken in case of emergencies;

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- Be constantly available, and if the person is unavailable, must designate a substitute who can respond as coordinator;
- Contact the emergency brigade in cases of need;
- Contact the Environmental Readiness Base, to initiate assistance in cases of accident;
- Ensure that the occurrence of accidents is reported to the responsible institutions and senior management;
- Coordinate the emergency until its finalization.

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9 MONITORING, INDICATORS AND CONTINUOUS IMPROVEMENT

9.1 Auditions

Portos do Paraná performs a periodic audition program to verify compliance with the IMS. Aiming at the continuous promotion of improvements. The audition criteria are established based on the guidelines of Conama Resolutions 306/2002 and 381/2006, which comprise premises widely disclosed in the company. Internal audits are carried out every six months, and external audits every two years.

9.2 Critical analysis and review of the IMS

Portos do Paraná periodically evaluates the procedures and identifies opportunities for improvement/creation of new procedures in regular meetings of the Environment Department.

The revision of the IMS Handbook must be coordinated by the managers of the environment and occupational health and safety, with the collaboration of the team of the Environment Board of Portos do Paraná. The review periodicity is biennial.

10 CONTINUOUS IMPROVEMENT

The promotion of continuous improvement is encouraged at all levels of the company.

10.1 Incident Management

The incident management guidance is regulated by PO-DIRAMB-022, on IMS Incident Management.

10.2 Non-Compliance Management

The team of the Environment Board of Portos do Paraná, including the members of the OHS Management, with the help of outsourced company employees, carry out inspections in the area of the ports, in order to verify compliance with the IMS Regulation and identify unconformities.

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When identified, non-conformities are managed in an inspection record spreadsheet by a third party company and by its own employees and registered in the Portos do Paraná application or via electronic mail.

Companies registered in the Environmental Department to provide port services are also inspected, seeking to regulate services performed in accordance with the IMS. Records of non-conformities of registered companies are carried out via electronic mail, external communication or official letter.