

Environmental and Social Action Plan

Item		Action	Deliverables	Due date
PS 1 Assessment and Management of Environmental and Social Risks and Impacts				
1	Integrated environmental and Social Management System	Incorporate to its own staff a specialist in health, safety, security, and environment, who will be responsible, at a managerial level, for the development, implementation and monitoring of the company's environmental, social, health, safety, and security management plans, programs and procedures, including the oversight of contracted companies and third parties. Such professional will be able to raise reports directly to the company's General Management. Desdelsur will appoint, or contract, if necessary, technical personnel in environmental, health, safety and security matters who will work in the industrial facilities, reporting to the manager appointed for such purpose. The academic background and experience of the health, safety, security, and environmental specialist to be appointed at the managerial level should have substantial experience in similar projects.	Proof of registration of employment of the environmental and health, safety and security specialist	June 29, 2019
2	Environmental and Social Policy	Issue an Environmental, Social, and Health, Safety and Security Policy that reflects the company's values and ensures compliance with the legislation and requirements applicable to the Project under the IFC's Performance Standards; such Policy will be signed by Management and will be mandatory for all own and contracted personnel.	Desdelsur's Environmental, Social, and Health, Safety and Security Policy	August 31, 2019
3	Identification of environmental and social impacts and occupational risks	Prepare a matrix to identify and assess environmental and social aspects, and a matrix for the identification and assessment of occupational risks. Both matrices will apply to all facilities and personnel activities of both Desdelsur and its contractors. These matrices shall consider the specifications for identifying and assessing aspects and risks set out in IFC Performance Standard 1.	Environmental aspects identification and assessment matrix Occupational risks identification and assessment matrix	August 31, 2019 August 31, 2019
4	Identification of legal aspects	Prepare a matrix to identify and evaluate legal aspects. Such matrix shall take into account the identification and assessment of the legal aspects associated with the legislation in force and all the legal commitments undertaken by Desdelsur, including those arising from loan agreements entered into with funding entities.	Legal aspects identification and assessment matrix	August 31, 2019
5	Organizational Capacities and Competences	Prepare an Annual Training Plan on environmental, social, health, safety and security matters for its own and contractor employees (for the latter, when the need for training is detected); in order to prepare it, the results of the identification and assessment of environmental aspects and occupational risks, the enactment of new legislation and the adoption of new technologies will be considered. The Training Plan shall provide for conducting emergency drills at industrial facilities, attendance records, identification of the type of courses or training to be provided (including emergency drills), those responsible for providing the training, the recipients of the training, the dates and locations selected for each course, and the formats for recording attendance.	Annual Training Plan	September 28, 2019
6	Emergency Preparedness and Response	Prepare, for each industrial, agricultural and livestock, and administrative facility, an Emergency Prevention and Response Plan that considers specific emergency scenarios	Emergency Prevention and Response Plans.	November 20, 2019

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		for each site and indicates the preventive and emergency response actions associated with those scenarios.		
7	Accident management	Prepare a procedure to manage environmental and/or occupational accidents that will apply both to its own and contractor employees. Such procedure shall provide for, at least, recording the nature and severity of the accident, the processing of basic legal aspects, a report of the investigation of the accident and the preventive and/or corrective measures adopted to avoid it happening again.	Accident Management Procedure	November 20, 2019
8	Operating Procedures	The corresponding management procedures to manage significant impacts and risks, identified through the corresponding matrices, shall be developed and implemented. Such set of procedures will include, at least, management procedures for: waste (of all types), feedlot carcasses, feedlot floor cleaning, agrochemicals, pesticides, internal fuel supply, health, safety and security in the mechanic workshop, ergonomics and use of personal protection equipment.	Indicated procedures of an operational nature	February 29, 2020
9	Contractor management	Develop and implement a documented procedure for managing contractors (including outsourced service personnel) that considers no less than: i) The basic environmental, health, safety and security requirements that contractors shall abide by; ii) contractors' obligations and prohibitions in environmental, health, safety and security matters; iii) the penalties, warnings or fines to be applied in the event of non-compliance. It should be borne in mind that, as required by IFC Performance Standard 1, contractors working for Desdelsur will be under the direct control of the company and will not be considered outsourced third parties for the purposes of the requirements of the Standard.	Contractor Management Procedure	December 27, 2019
10	Monitoring and Evaluation	<p>Prepare a Monitoring and Tracking Plan of significant environmental, social, and health, safety and security aspects associated to the entirety of Desdelsur's activities, and of the occupational risks of own and contracted personnel. In health, safety and security matters, the Plan shall, at least, include tracking of the following parameters:</p> <ol style="list-style-type: none"> 1- Workplace air quality 2- Environmental air quality 3- Noise at work levels 4- Drinking water quality (annual) 5- Occupational accidents Frequency and Severity Rates (monthly) 6- Blood cholinesterase level of workers exposed to pesticide handling (annual) 7- Ground resistance of electrical panels <p>Tracking of the environmental variables required by the environmental authority (such as soil quality, flora, fauna, etc.) and the environmental variables required by the monitoring plans set out in specific studies (such as groundwater quality monitoring) shall be incorporated to the Monitoring and Tracking Plan.</p> <p>The adoption of admissible parameter threshold values will consider what is specified by the legislation in force and what is indicated by IFC's operational guidelines, adopting, in the event of their overlapping, the most demanding criterion. Tracking will include an analysis of possible root causes of</p>	Environmental, Social, and Health, Safety and Security Monitoring and Tracking Plan	February 29, 2020

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		events in which the measured values exceed the acceptable thresholds set forth in the legislation in force or the applicable IFC guidelines		
11	Participation of Social Actors	Identify and implement contact channels to allow anyone in the community to ask questions, file a grievance or complaint, or make suggestions; to complement this, develop and implement a mechanism to receive, resolve and respond to such concerns, defining responsibilities and maximum communication and resolution times.	Contact channels to allow for asking questions, filing a grievance or complaint, and making suggestions, as well as suitable resolution mechanisms to address such concerns.	August 31, 2019
PS 2 Labor and Working Conditions				
12	Identification of sources of diffuse contamination in workplace air - Solution Projects	<p>i) Prepare the Terms of Reference to conduct a study that contemplates a) determining the workplace environmental air quality at Desdelsur's industrial plants; b) identifying sources of diffuse air pollution in the work environment, pointing out possible deficiencies in localized vacuum systems; c) drawing conclusions and making recommendations. The ToR should ensure that the scope of the tasks and the profile of the professionals to be hired are suitable to carry out the work in accordance with the legal requirements in force and with the requirements of international best practices.</p> <p>ii) Conduct the reference study</p> <p>iii) Having analyzed the different proposals for a solution, proceed to contract a company with a suitable background and experience in the design and construction of localized vacuum and evacuation systems for contaminated air, which guarantee a workplace air quality that fulfills the requirements of the legislation in force and the applicable IFC guidelines.</p>	<p>i) Terms of Reference</p> <p>ii) Study to identify diffuse sources - Proposals for a solution</p> <p>iii) Design and construction of localized vacuum and evacuation systems for polluted air</p>	<p>i) September 28, 2019</p> <p>ii) December 27, 2019</p> <p>iii) December 27, 2020</p>
13	Human Resources Policies and Procedures	Prepare and implement a mechanism for the reception and resolution of grievances, complaints or suggestions that direct or contractor employees may have, allowing an anonymous communication modality. The mechanism will include the allocation of responsibilities for receiving, resolving, and communicating the results of the process, and a maximum time frame for implementing corrective actions and/or responding, if appropriate, to the complainant, grievance, or suggestion	Resolution mechanisms for grievances and complaints	August 31, 2019
PS 3 Resource Efficiency and Pollution Prevention				
14	Resource consumption and waste recycling optimization	Estimate the monthly water consumption and record the monthly power consumption for each of the industrial, agricultural and livestock, and administrative facilities. Record the monthly and cumulative annual fuel consumption of vehicles and machinery owned by the company and the amount of containers and waste recycled each year, by type. Implement and monitor a program to progressively reduce the specific consumption of water, power, and fuel and increase waste and container recycling.	Monthly and cumulative annual water, power, and fuel consumption, and amount of containers and waste recycled.	January 31, 2020
15	Greenhouse Gases	Prepare a Greenhouse Gas Inventory. The methodology to be used may be based on ISO Standard 14064-1, using the Corporate Accounting and Reporting Standard (ECCR) of the GHG Protocol as a working guide	Greenhouse Gas Inventory	February 27, 2021

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16	Environmental assessment of feedlot effluents	<p>i) Prepare the Terms of Reference (ToR) to perform an environmental impact assessment that will enable identifying and evaluating: a) Suitability of the type and sufficiency of the system used to treat the effluents generated by the feedlot, considering future extensions of the feedlot facilities; b) possible impacts generated on the soil, surface and groundwater due to inadequately treated effluents, which would possibly require a hydrogeological study of the area; c) possible effects on groundwater availability for miscellaneous use by the neighboring population, considering its possible contamination due to the operation of the feedlot; d) soil and groundwater quality in the area possibly affected by the disposal of feedlot effluents; e) Soil, groundwater, and surface water quality monitoring plan, instructing, if necessary, the construction of monitoring wells; f) Conclusions and recommendations. The ToR should ensure that the scope of the tasks and the profile of the professionals to be hired are suitable to carry out the work in accordance with the legal requirements in force and with the requirements of international best practices.</p> <p>ii) Perform the abovementioned environmental impact assessment.</p> <p>ii) Having analyzed different proposals, if necessary, contract a company to design and build the effluent treatment facilities; the Project shall guarantee that the quality of the treated effluent will comply with the legal parameters and/or those required by the applicable IFC guidelines.</p>	<p>i) Terms of Reference of the Environmental Assessment</p> <p>ii) Environmental Impact Assessment</p> <p>iii) Project for the design and construction of treatment facilities</p>	<p>i) December 27, 2019</p> <p>ii) June 30, 2020</p> <p>iii) October 30, 2021</p>
17	Groundwater availability	<p>i) Prepare the Terms of Reference (ToR) to conduct a hydrogeological study that will enable knowing the possible impact that the water consumption of Desdelsur's industrial, agricultural, and livestock activities may have on groundwater availability for the population in the vicinity of Desdelsur's facilities and fields in operation. The ToR should ensure that the scope of the tasks and the profile of the professionals to be hired are suitable to carry out the work in accordance with the legal requirements in force and with the requirements of international best practices.</p> <p>ii) Conduct the reference hydrogeological study.</p>	<p>i) Terms of Reference of the hydrogeological study</p> <p>ii) Hydrogeological study</p>	<p>i) January 31, 2020</p> <p>ii) November 30, 2020</p>
PS 4 Community Health, Safety and Security				
18	Safety and security when transporting hazardous substances	In its Education and Training Plan, Desdelsur will include at least one drill per year on emergency situations in the transportation of agrochemicals.	Annual Training Plan	September 28, 2019
19	Road safety	Prepare and implement a specific procedure to address the safe operation of all types of machinery and vehicles owned by Desdelsur. Such procedure will specify how the vehicles should be driven in order to increase road safety. The procedure will include a safe driving instructions format that will be provided to the contracted truck drivers.	Procedure for the safe operation of machinery and vehicles	November 20, 2019