SUGAL – CHILE
Environmental and Social Action Plan (ESAP)

No.	Aspect	Action	Deliverable	Delivery Date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Identification of Risks and Impacts	Include the identification and assessment of environmental and social risks associated with the supply chain and community health and safety, including, among others, road safety related to the transportation of inputs and products, and the risks of gender-based violence.	1. Updated Risk and Impact Matrix	1. Three months after the first disbursement
1.2	Gender Programs	Implement a gender-sensitive recruitment procedure to promote the hiring of women in underrepresented areas, ensuring equal conditions and non-discrimination. These measures will apply to all personnel, including contractors. Additionally, develop a Gender Strategy and a policy against sexual harassment, with specialized training, confidential and non-retaliatory mechanisms, and monitoring through indicators to strengthen gender risk management.	1. Specific Gender-Sensitive Recruitment and Hiring Procedure	1. Six months after the first disbursement
1.3	Exposure to climate change	Strengthen climate risk management through the systematic identification of vulnerabilities, risks, and climate impacts in its own operations and those of its critical suppliers. As a result of this analysis, the company must identify and prioritize adaptation measures that reduce its exposure—and that of its value chain—to risks associated with climate change, thereby contributing to improved operational resilience and the sustainability of its operations.	1. Climate Risk Identification Procedure. 2. Risk and Impact Matrix Updated to Include Climate Risks	1. Six months after the first disbursement 2. Six months after the first disbursement
1.4	Management programs	Develop and implement specific procedures to manage all material environmental and social risks and impacts, including those associated with the supply chain.	1. Procedures for managing environmental and social risks	1. Six months after the first disbursement
1.5	Organizational Capacity	Strengthen the Risk Prevention and Environment team, both in terms of human resources and technical expertise related to environmental management.	1. Evidence that the team has been strengthened to ensure operational capacity	1. Six months after the first disbursement
1.6	Emergency Preparedness and Response	Update its Emergency Preparedness and Response Plans to incorporate specific measures for coordination, communication, and assistance to potentially affected communities. To this end, it will identify the communities and individuals that could be affected by emergencies associated with its operations and define mechanisms to communicate risks and response procedures in a timely manner. It will also establish formal mechanisms for collaboration with neighboring communities, local authorities, and emergency response services, especially when their participation is necessary to ensure an effective response.	1. Updated Emergency Preparedness and Response Plans	1. Nine months after the first disbursement
1.7	Monitoring and Evaluation	It will strengthen its environmental inspection and audit procedures to ensure systematic monitoring of the implementation of identified recommendations and corrective actions. This procedure must establish clear mechanisms for prioritizing, monitoring, and closing out actions, as well as ensure the timely approval and allocation of necessary resources by senior management, thereby guaranteeing the effectiveness of the management system.	1. Update to the internal inspection and audit procedure	1. Nine months after the first disbursement

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1.8	Involvement of Social Stakeholders	Update its Community Engagement Plan within the Environmental and Social Management System. The update must strengthen the analysis and prioritization of potentially affected stakeholders, incorporate differentiated measures to ensure the effective participation of vulnerable or disadvantaged groups, improve the proactive disclosure of relevant environmental and social information, and establish systematic mechanisms for monitoring commitments, consultations, and community feedback.	1. Update of the Community Engagement Plan 2.	1. Six months after the first disbursement
1.9	Complaints and Grievances Mechanism	Expand the scope of its grievance mechanism to include sensitive social and environmental issues, such as gender-based violence, environmental risks and impacts, concerns of neighboring communities, and adverse effects on vulnerable groups. Furthermore, the mechanism must guarantee accessibility, confidentiality, freedom from retaliation, and a clear process for receiving, recording, evaluating, and responding to complaints in a timely manner. Sugal will demonstrate the effective dissemination of information regarding the existence of the complaints mechanism as part of the social stakeholder engagement process.	1. Update the Suggestion Management and Conflict Resolution Procedure to include sensitive social and environmental issues. 2. Effectively publicize the existence of the Complaints Mechanism as part of the social stakeholder engagement process.	1. Six months after the first disbursement. 2. As part of the Environmental and Social Compliance Report (ICAS)
PS 2: Labor and Working Conditions				
2.1	Complaint-Handling Mechanism	Strengthen its complaint-handling mechanism for workers, ensuring that it is accessible to direct employees, temporary workers, contractors, and subcontractors. The company must ensure that the mechanism is communicated to all workers at the time of hiring, that it allows for the submission of complaints anonymously, that it ensures confidentiality and the absence of retaliation, and that it has clear and transparent procedures for receiving, recording, evaluating, and responding in a timely manner to the concerns raised.	1. Update to the employee grievance mechanism.	1. Six months after the first disbursement
2.2	Occupational Health and Safety	The company will develop and implement a heat stress prevention and management program, including risk assessments, the provision of shaded rest areas with drinking water, the adjustment of work and rest schedules according to weather conditions, and training for workers and supervisors to identify and respond to symptoms associated with heat stress. Additionally, the company will develop and implement a monitoring system to evaluate the program's effectiveness.	1. Heat Stress Prevention and Management Program 2. Monitoring system to evaluate the program's effectiveness.	1. Six months after the first disbursement 2. Six months after the first disbursement
2.3	Supply Chain	Update contracts with agricultural suppliers to include clauses prohibiting child and forced labor and strengthen its procedures for monitoring agricultural suppliers, in order to prevent identified risks related to child and forced labor in its supply chain.	1. Inclusion of clauses prohibiting child and forced labor in contracts with agricultural suppliers. 2. Procedure for identifying and managing child and forced labor in its supply chain	1. One year after the first disbursement 2. Six months after the first disbursement
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Water consumption	Conduct risk assessments related to water availability for the Talca and Tilcoco plants as part of strengthening their water resource management and aligning it with international best practices.	1. Technical Report: Risk Assessments Related to Water Availability for the Talca and Tilcoco Plants	1. One year after the first disbursement

No.	Aspect	Action	Deliverable	Delivery Date
3.2	Pesticide Management and Use	Update the Pest Control Procedure to prohibit the external pest control service from using pesticides classified by the WHO as Class Ia and Ib.	1. Update to the Pest Control Procedure	1. Six months after the first disbursement
PS 4: Community Health, Safety, and Security				
4.1	Security Personnel	Train all security personnel on human rights, as well as on prevention and response to situations of violence, harassment, and sexual exploitation (SEAH), and on principles of professional conduct, in line with applicable international standards.	1. Evidence of training in human rights and the prevention of and response to situations of violence, harassment, and sexual exploitation	1. Nine months after the first disbursement
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
6.1	Protection and Conservation of Biodiversity	Develop a Biodiversity Management and Conservation Plan, which will include measures aimed at preventing, minimizing, and restoring impacts on biodiversity. Additionally, the company will implement an annual biodiversity monitoring program that incorporates sampling points in natural habitats adjacent to its operations. Finally, Sugal Chile will integrate biodiversity management into its process for selecting new agricultural sites—both owned and leased—through a screening procedure that includes specific biodiversity criteria.	1. Biodiversity Management and Conservation Plan 2. Annual Biodiversity Monitoring Program 3. Updated Procedure for Selecting New Agricultural Sites	1. Nine months after the first disbursement 2. Nine months after the first disbursement 3. Nine months after the first disbursement