

DELTA SUCROENERGIA PROJECT - BRAZIL
Environmental and Social Action Plan (ESAP)

No	Area	Action	Product/Deliverable	Completion date
PS 1: Assessment and management of Environmental and Social Risks and Impacts				
1.1	E&S Assessment and Management System	Continue implementing, in all its units, an integrated E&S, Health and Safety Management System consistent with the requirements of PS 1 related to health and safety issues for both industrial and agricultural areas covering the following actions: (i) improving the policy to internalize all IFC PS 1 guidelines, establishing annual improvement goals as part of the business planning and sharing the policy and procedures with the suppliers; (ii) defining the procedure, schedule and technical team needed to carry out, review and improve risk assessments, and implementing a procedure with the involvement of its personnel in the risk assessment; (iii) developing an EHS and operational changes improvement action plan establishing performance standards for management programs; (iv) assessing personnel training and identifying the system improvements and weaknesses in order to optimize emergency preparedness and response measures, and having the Top Management review the procedures; (v) establishing procedures to monitor and measure the effectiveness of the management program and the compliance with any legal and/or contractual obligations and regulatory requirements. The Company should appoint a professional in charge of the monitoring activities, an internal audit procedure and a periodic review schedule; (vi) implementing proactive communication, identifying, documenting and analyzing efforts and the main results obtained in engaging stakeholders (e.g. contact with communities through city councils, when required); (vii) establishing a periodic assessment of the system by the Top Management and the technical team, and of the results obtained regarding external communication and grievance mechanisms; and (viii) developing a specific procedure to prepare external communication reports and grievance mechanisms, and defining the team in charge of implementing such procedure.	<ol style="list-style-type: none"> 1. Preparation of the Work Plan to implement the ESMS 2. Preparation and publication of the new sustainability policy onto the Company's web site 3. Preparation of the initial report with the final version of the E&S, Health and Safety Management System in accordance with the IFC's PS 1 4. Report including the results of the management system implementation 5. Progress reports 	<ol style="list-style-type: none"> 1. Before the first disbursement 2. 3 months after signing the loan agreement 3. 8 months after signing the loan agreement 4. 16 months after signing the loan agreement 5. Annually through the E&S Compliance Report (ESCR)
1.2	External Communication and Grievance Mechanisms	Prepare and distribute the Company's annual E&S management reports.	Annual sustainability report	Annually with the publication of the first report in 2022 (ref. 2021).
PS 3: Resource Efficiency and Pollution Prevention				
3.2	Pollution Prevention	<ol style="list-style-type: none"> 1. Submit the technical justification for the use of pesticides considered hazardous by the WHO. 2. Prepare a plan with pesticide alternatives with low toxicity for humans and the environment. 3. Refrain from buying, storing or using pesticides classified as 1a (extremely toxic) or 1b (highly toxic). 	<ol style="list-style-type: none"> 1. Initial report with safety conditions and technical justification 2. Plan with lower-toxicity pesticide alternatives 3. Communication showing the ban on purchasing such pesticides and preparation of a procedure to dispose of such pesticides 	<ol style="list-style-type: none"> 1. 90 days after signing the loan agreement 2. 120 days after signing the loan agreement 3. 90 days after signing the loan agreement

PS 4: Community Health and Safety					
4.1	Community Health and Safety	Develop and implement a heavy vehicle traffic safety program considering the following measures: i) traffic and road safety program for the urban areas of Delta to be disseminated among Company workers and neighboring communities; ii) hazardous materials management and safety; iii) emergency preparedness and response.	1. Initial report including the evaluation of transportation routes and local status of the units to identify any conflicts and points for improvement 2. Initial report including structural and management (signaling, traffic procedures, etc.) measures to resolve any issues, if necessary 3. Report describing the progress of the activities carried out	1. 6 months after signing the loan agreement 2. 8 months after signing the loan agreement 3. Annually through the E&S Compliance Report (ESCR)	
4.2	Community Health and Safety	Develop gender violence prevention educational content to be disseminated among the Company's employees and suppliers.	1. Educational content for the prevention of gender-based violence. 2. Monitoring reports on the informative campaigns for the prevention of gender-based violence.	1. 90 days after signing the loan agreement 2. Annually through the E&S Compliance Report (ESCR)	