

**COPEVAL IMPORT FINANCE – 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	National Legislation	1. Obtain the pending groundwater rights for the well in the San Carlos Agribusiness plant	1. Approval Resolution of the Dirección General de Aguas	1. 9 months after the first disbursement.
1.2	Environmental and Social Management System (“ESMS”)	1. Update the ESMS to incorporate the new plans and procedures described in this ESAP	1. Updated ESMS	2. 12 months after the first disbursement.
1.3	Policy	1. Update the ESMS policy to incorporate the commitment to the community health, safety, and security.	1. (i) Updated ESMS Policy approved by management (ii) Evidence of disclosure.	1. (i) 6 months after the first disbursement. (ii) 9 months after the first disbursement.
1.4	Identification of Risks and Impacts	1. Update the risks and impacts analysis, including those caused by climate change. 2. Develop and implement an identification and evaluation procedure for community risks and impacts caused by the Company’s activities.	1. Updated environmental risk matrix 2. (i) Procedure to identify and evaluate risks and impacts on the community. (ii) Evidence of implementation.	1. 9 months after the first disbursement. 2. (i) 9 months after the first disbursement. (ii) Annually as part of the Environmental and Social Compliance Report (ESCR).
1.5	Gender Risk	1. Sign the declaration of support for the Women’s Empowerment Principles. 2. Complete the gender gap analysis tool (WEP ¹).	1. Declaration of support for the Women’s Empowerment Principles. 2. WEP tool results report.	1. 3 months after the first disbursement. 2. 9 months after the first disbursement.
1.6	Organizational Capacity and Competency	1. Continually update the “Responsibility, authority and communication” section of the ESMS to reflect all persons responsible and their roles	1. Updated ESMS manual	1. 4 months after the first disbursement.
1.7	Stakeholder Engagement	1. Develop and implement a Stakeholder Engagement Plan (“SEP”) to include: (i) stakeholder engagement mapping, analysis, and planning; (ii) a stakeholder information publication and communication mechanism; and (iii) a community grievance reception, resolution, and recording mechanism.	1. (i) Stakeholder engagement plan (ii) Evidence of implementation.	1. (i) months after the first disbursement. (ii) Annually as part of the ESCR.
1.8	External Grievance Mechanisms	1. Develop and implement a mechanism for the reception and resolution of community grievances that includes recording, monitoring, analyzing and responding to grievances, in addition to establishing how this mechanism will be disseminated to stakeholders.	1. (i) Mechanism for receiving and resolving grievances (ii) Evidence of implementation.	1. (i) 9 months after the first disbursement. (ii) Annually as part of the ESCR.
PS 2: Labor and Working Conditions				
2.1	Internal Grievance Mechanism	1. Develop and implement a procedure to strengthen the internal grievance mechanism, which will establish: i) how to evaluate complaints; ii) how to formulate and monitor responses; iii) how to evaluate and improve the mechanism; and iv) how the to communicate and disseminate the mechanism. The mechanism shall be able to receive and handle anonymous complaints and ensure that the entire process is confidential.	1. (i) Procedure for handling internal grievances (ii) Evidence of implementation.	1. (i) 6 months after the first disbursement. (ii) Annually as part of the ESCR.

¹ Women’s Empowerment Principles (“WEP”) Gender Business Tool. <https://weps-gapanalysis.org/about-the-tool/>

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2.2	Workers Engaged by Third Parties	1. Include a clause in contractors' contracts requiring compliance with COPEVAL's ESMS	1. Clause added to contracts	1. 9 months after the first disbursement.
2.3	Supply Chain	1. Develop and implement a Supplier Code of Conduct that, at least, requires compliance with national labor laws, and the ILO and UN international conventions listed in PS2. This Code will be included in new contracts for major suppliers or in declarations of understanding for suppliers without a contract. 2. Require all grain and alfalfa suppliers that deliver these products to agribusiness plants to sign a declaration of understanding of the Code of Conduct. The Co-borrower will monitor the compliance with this code. 3. Develop and implement a procedure to identify and assess risks mainly related to child and forced labor for the entire supply chain.	1. (i) Code of Conduct for Suppliers (ii) Evidence of dissemination to all major suppliers (iii) Evidence of implementation. 2. (i) Signed declarations from grain and alfalfa suppliers. (ii) Evidence of implementation of compliance monitoring. 3. (i) Procedure for identifying and assessing risks primarily related to child and forced labor (ii) Evidence of implementation.	1. (i) 6 months after the first disbursement. (ii) 6 months after the first disbursement. (iii) Annually as part of the ESCR. 2. (i) 12 months after the first disbursement. (ii) Annually as part of the ESCR. 3. (i) 12 months after the first disbursement. (ii) 12 months after the first disbursement and then annually as part of the ESCR.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Greenhouse Gases (GHG)	1. Prepare and update a Greenhouse Gas Inventory, in accordance with the GHG protocol ² that considers, at least, Scope 1 (direct sources) and Scope 2 (indirect sources) emissions . The baseline will be 2022	1. GHG inventory annual report	1. Annually as part of the ESCR.
3.2	Pesticide Use and Management	1. Develop and implement a policy on Ia and Ib pesticide use, which prohibits the purchase, distribution, and sale of these pesticides. This policy shall describe the evaluation and control processes that prevent the incorporation of these products into future inventories.	1. (i) Policy on the use of pesticide Ia and Ib (ii) Evidence of implementation.	1. (i) 9 months after the first disbursement. (ii) Annually as part of the ESCR.
PS 4: Community Health, Safety, and Security				
4.1	Emergency Preparedness and Response	1. Update the General Emergency Response Plan to include emergencies that may affect neighboring communities, considering risk situations and emergencies under various scenarios and their potential impact on local communities	1. Updated and approved General Emergency Response Plan	1. 9 months after the first disbursement.
4.2	Security Personnel	1. Develop and implement procedures for security personnel that align with the United Nations Voluntary Principles on Security and Human Rights ³ .	1. (i) Procedure for security personnel (ii) Evidence of implementation.	1. (i) 6 months after the first disbursement. (ii) Annually as part of the ESCR.

² Greenhouse Gas Protocol. Corporate Accounting and Reporting Standard: <https://ghgprotocol.org/corporate-standard>

³ Voluntary Principles on Security and Human Rights. <https://www.voluntaryprinciples.org/the-principles/>