

VICENTIN EXPANSION ENVIRONMENTAL AND SOCIAL CORRECTIVE ACTION PLAN (CAP)

MAY 11TH 2005

#	<u>Task</u>	<u>Required Action and/or Documentation to Demonstrate that Task is Complete</u>	<u>By Whom</u>	<u>Required Task Completion Date</u>
A.	Develop & Implement an Integrated Management System			
1	<u>Appoint Qualified Manager to Plan and to Implement Vicentin Group Integrated Environmental, Social, Quality, Food Safety and Occupational Health and Safety Management System</u>	Qualified professional with requisite quality system management education and experience is appointed to plan and implement the Vicentin Corporate Integrated Program.	Vicentin Group	<i>Condition of Investment Agreement Signing</i>
2	<u>Prepare and Distribute Vicentin Group Corporate Environmental, Social, Quality, Food Safety and Occupational Health and Safety Policy Statement.</u> Develop and implement a company wide, integrated Environmental, Social, Occupational Health and Safety Management policy.	Provide IFC with a written, detailed corporate policy statement addressing Vicentin's mission and policy with regard to Quality, food safety, occupational health and safety and environmental and social affairs management. Obtain senior management endorsement and signature for the policy. Policy statement shall be signed by Vicentin CEO/Vicentin Board.	Vicentin Group	<i>Condition of C Loan Disbursement</i>
3	<u>Conduct Education Campaign To Communicate Content and Objectives of Environmental and Social, Quality, Food Safety and Occupational health and Safety Management Policy.</u> Communicate content and intent of the approved Environmental and Social Management Policy to all Vicentin, Friar and Algodonera Avellaneda producers, personnel, goods and	Communication of policy content, goals and objectives to producers and customers; Communication of policy content, goals and objectives to all employees;	Vicentin Group	<i>Condition of C Loan Disbursement</i>

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	services suppliers.	Communication of policy content, goals and objectives to goods and services suppliers		
4	<u>Design a certifiable integrated management system based upon internationally recognized management systems (e.g. ISO 9001-2000, ISO 14000, SA 8000, HACCP or equivalent and OHSAS 18000).</u> Design the system to ensure compliance with Argentine regulations and IFC policies and guidelines requirements. The integrated management system shall encompass environmental and social affairs, quality, food safety, occupational health and safety. The management system shall be developed by qualified professionals with adequate understanding of international trends in management system evolution and implementation.	Provide description of system design, approved quality policies and mission statements, procedure format, table of contents for corporate procedure manuals	Vicentin Group	<i>Condition of C Loan Disbursement</i>
5	<u>Appoint Environmental, Social, Quality, Occupational health and Safety Affairs Manager at each operating Facility.</u>	Qualified professionals acceptable to IFC have been appointed to posts in Vicentin, Friar and Algodonera Avellaneda operations. Submit position description and CVs to IFC.	Vicentin Group	<i>Condition of C Loan Disbursement</i>
6	<u>Complete Integrated Quality Systems Procedures Manual.</u> Complete All Standard Operating Procedures Required for Vicentin Group Integrated Environmental, Social, And Quality, Food Safety and Occupational Health and Safety Management System.	Submit to IFC Standard Operating Procedures Manual Table of Contents and all completed Procedures required to implement the integrated management system.	Vicentin Group	<i>Condition of A Loan Disbursement</i>
7	<u>Audit implementation of Integrated Environmental, Social, Quality, Food Safety and Occupational</u>	Submit to IFC a report from an independent	Vicentin Group	<i>Condition of A Loan disbursement</i>

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	<u>Health and Safety Management System</u>	qualified third party on the implementation of the Management System and recommendations for areas still to be improved for full compliance with the initial design if necessary.		<i>plus 12 months</i>
B.	<u>Pesticide Formulation Plant</u>			
8	<u>Document Compliance of Vicentin Pesticide Formulation Plant Distribution System</u> with regulatory requirements for licensing, formulation, storage and associated matters.	Provide IFC with regulatory agency audit reports or if this is not available, qualified independent third party report, demonstrating compliance and/or non compliance with pesticide distribution regulation scheme in Argentina. All compliance deficiencies shall be clearly articulated along with the corrective actions required to rectify the noted deficiency.	Vicentin Group	<i>Condition of C Loan Disbursement</i>
9	<u>In case of non compliance with Argentine regulatory framework for distribution, implement correction measures identified above on distribution issues</u>	Provide IFC with technical evidence to demonstrate regulatory agency identified or qualified technical audit-identified deficiencies have been eliminated to the satisfaction of the auditing agency or the third party qualified professionals that conducted the compliance audit.	Vicentin Group	<i>Condition of A Loan Disbursement</i>
C.	<u>Edible Oil Refinery</u>			
10	<u>Avellaneda Edible Oil refining Facility Audit</u>	Submit to IFC an independent third party audit of the facility on environmental and Health and Safety Issues with recommendations if	Vicentin Group	<i>Condition of C Loan Disbursement</i>

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		necessary for plant upgrading to meet full compliance with IFC and Argentina policies and guidelines, a calendar and a budget for implementation		
11	<u>Commitment to full implementation of audit recommendations</u>	Submit to IFC an acceptable calendar for implementation of audit recommendations	Vicentin Group	<i>Conditions of A Loan Disbursement</i> <i>To be included as positive covenant in loan agreement</i>
D.	Friar Meat Processing Facility			
12	Demonstrate compliance with Argentina regulations on food safety for the Santa Fe plant	Submit to IFC full documentation of on site procedure to comply with Argentina Environmental, Health and Safety and Food Safety issues.	Vicentin Group	<i>Condition of Investment Agreement Signing</i>
13	<u>Build a Waste Water Treatment Plant for the Friar Meat Packaging facilities at Reconquista to fully meet IFC's and Argentina's requirement on effluent quality prior to discharge</u>	Submit to IFC signed construction contract with construction schedule and constructor guarantees on effluent quality	Vicentin Group	<i>Condition of A Loan Disbursement</i>
14	<u>Complete all corrective measures, construction measures and clean production measures required to bring all emissions to the environment into compliance with IFC guideline and Argentine regulatory requirements.</u>	Submit quantitative environmental monitoring data report with the revised parameters achieved after installation of remedial engineering equipment or facilities to achieve compliance with Argentine regulatory and IFC guideline limits. Correct all deficiencies prior to submittal of report to IFC.	Vicentin Group	<i>Condition of A Loan Disbursement plus 12 months.</i> <i>To be included as positive covenant in loan agreement</i>
E.	Monitoring			
15	<u>Develop environmental monitoring program for all Vicentin, Friar and</u>	Submit Monitoring plan to IFC.	Vicentin Group	<i>Condition of C Loan</i>

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	<p><u>Algodonera Avellaneda Operations.</u> As part of planning the integrated management system for environmental and social affairs, quality, food safety and occupational health and safety, develop a monitoring plan to characterize ambient and point source air emissions, ambient noise, process and potable water quality, sanitary and process wastewater discharges, non-hazardous and hazardous solid and liquid waste discharges, and any other emissions to the environment. Measurements will also characterize workplace conditions, such as air quality, noise, illumination intensity, heat stress, and other parameters in specific critical operating areas. The parameters measured must be in agreement with the technical monitoring parameters that are required for compliance with the Annual monitoring Report (AMR) format.</p>			<i>Disbursement</i>
16	<p><u>Implement environmental monitoring program for all Vicentin, Friar and Algodonera Avellaneda Operations.</u></p>	<p>Implement quantitative data collection and environmental monitoring program described above. Once the monitoring program has been conducted, provide IFC with quantitative data report and analysis.</p>	Vicentin Group	<i>Condition of A Loan Disbursement</i>
17	<p><u>Conduct emissions gap analysis for all Vicentin, Friar and Algodonera Avellaneda Operations.</u> Once the monitoring program has been conducted, provide IFC with quantitative data report; identify all parameters out of compliance with IFC guideline requirements; prepare corrective action plan (CAP) describing mitigation measures and scheduled completion date for implementation of corrective measures to eliminate the noted deficiency.</p>	<p>Submit quantitative environmental monitoring data report. Provide technical description of mitigation measures that will be implemented on each of the parameter out of compliance; and submit detailed completion schedules for implementing corrective measures. Provide copies of signed construction contracts with 100% penalty for cancellation</p>	Vicentin Group	<i>Condition of A Loan Disbursement</i>

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		clauses for all air emissions and wastewater management corrective measures.		
F.	Reporting			
18	<u>Prepare and Submit Proposed Consolidated Annual Environmental Monitoring Report (AMR) format.</u> Consolidated environmental reporting format (AMR) will include data from all Vicentin, Friar, Vicentin Pesticide Formulation and Algodonera Avellaneda plants. Coordinate data collection for each facility for Annual Monitoring Report (AMR) assembly and consolidation. Provide quantitative data for all discharges to environment (air, water, noise, wastewater, solid waste). Provide occupational health statistical data and employee training information.	Proposed consolidated reporting format is acceptable to IFC.	Vicentin Group	<i>Condition of C Loan Disbursement</i>
19	<u>Submit First Consolidated AMR to IFC.</u>	Submit Consolidated AMR acceptable to IFC.	Vicentin Group	<i>Condition of A Loan Disbursement</i>