

**Submission of the**  
**INGENIO EL ÁNGEL S.A DE CV.**  
**to the**

**OFFICE OF CHILD LABOR, FORCED LABOR, AND HUMAN TRAFFICKING (OCFT),  
BUREAU OF INTERNATIONAL LABOR AFFAIRS, U.S. DEPARTMENT OF LABOR,**

**pursuant to**

**CHILD LABOR, FORCED LABOR, AND FORCED OR INDENTURED CHILD LABOR IN THE PRODUCTION  
OF GOODS IN FOREIGN COUNTRIES AND EFFORTS BY CERTAIN FOREIGN COUNTRIES TO  
ELIMINATE THE WORST FORMS OF CHILD LABOR, AND BUSINESS PRACTICES TO REDUCE THE  
LIKELIHOOD OF FORCED LABOR OR CHILD LABOR IN THE PRODUCTION OF GOODS**

Docket No. DOL-2020-0007

January 18, 2021

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On behalf of the sugar industry in El Salvador, please accept our kind wishes for a very prosperous 2021, with many professional and personal successes.

I would like to thank you for the opportunity to present and detail all the accomplishments met towards the eradication of child labor in our sugar cane's cultivation and harvest. Since 2002, we have worked proactively to eradicate in our country, with strategic allies such as the Labor Ministry and Social Welfare of El Salvador, the International Labor Organization (ILO), the Interamerican Bank of Development, and international customers such as Coca Cola, among others. Together have we led a guided effort under the "Zero Tolerance for Child Labor Policy", which has been identified as a good practice nationally and internationally.

Our Zero Tolerance Policy entails the strict exclusion of workers under 18 years of age to be involved in the sugar crop's harvest and activities, as well as all the necessary mechanisms implemented to ensure compliance of said policy.

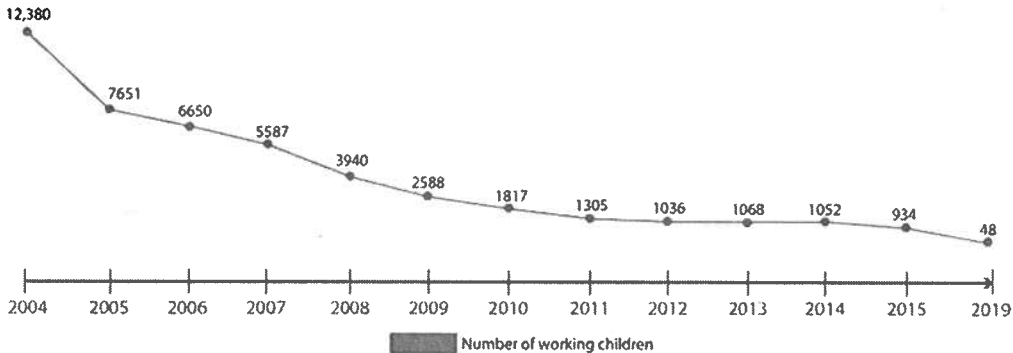
The Zero Tolerance Policy consists of the following 5 strategic pillars:

1. **Permanent Awareness** to strategic public
2. **Standardization of actions carried out by the six sugar mills in the country**, which includes three elements:
  - a. Specific clauses of the prohibition and termination of sugarcane purchase-sale contracts, due to hazardous child labor.
  - b. Action Protocol.
  - c. Human Resource specialized in the subject.
3. **Public-private alliances**, among the most relevant, we are members of the “National Committee for the Eradication of the Worst Forms of Child Labor”.
4. **Permanent monitoring** during all months of the year.
5. **Communication**, we participate in various forums at an international level.

The Sugar Sector in El Salvador has been recognized worldwide by the International Labor Organization. We participated in the “III World Conference on Child Labor” in 2013, as speakers for the theme “Child Labor in the Supply Chain”. The Conference was chaired and organized by the Government of Brazil, in collaboration with the International Labor Organization (ILO), which brought together more than 130 countries, represented by governments, workers’ and employers’ organizations, and civil society.

Through the implementation of the Zero Tolerance Policy in 2015, we have eradicated child labor. The most recent figures audited by our sector show a 99% decrease in the industry.

**Decline in child labor in sugar cane cultivation and harvesting in El Salvador**



It is important to note that, from the beginning of the efforts to eradicate child labor in our company, awareness existed that said objective would require a permanent process, bearing in mind the need to provoke a cultural change in rural populations, as well as the need to create opportunity conditions for people's development.

We must emphasize that the eradication of child labor in sugar cane's cultivation and harvest is part of a larger and more comprehensive effort in search of sustainability and sustainable agricultural production. These efforts are reflected in the **Good Agricultural Practices Manual** and in the construction of a **Good Practices Observatory** that will allow the monitoring and measurement of progress in the implementation of good agricultural practices in child labor, occupational health, and safety, as well as environmental indicators; all being fundamental instruments of the Strategic Sustainability Plan.

Our Company have recent, reliable, and systematic data compiled annually, and we continue to work together with of El Salvador's government. We consider the data obtained by the Salvadoran sugar sector as a valuable input to aid towards the removal of El Salvador's sugar cane sector from the "List of goods produced with child labor and / or forced labor".

Ingenio El Ángel are confident in the strength of our systems and the continuation of the Zero Tolerance for Child Labor Policy, included in the "Strategic Sustainability Plan", as a continuous and systematic good practice.

We kindly extend an invitation to a field visit, wherever you consider essential, to verify the all the above mentioned.

Without further ado, I bid you farewell expressing my highest regards and esteem.

Carmen Calderón  
Human Resources

