

## Corrective Action Plan Atul Ltd.

The BORROWER commits to the actions as specified below, within the specified deadlines, and declares that the resources specified below have been allocated.

| <u>Issue</u>                            | <u>Proposed Actions</u><br>(Mitigation, Management, Monitoring, and Institute Methods)                                                                                                                                                                 | <u>Target Completion Date</u>                                                                                                                                                    |
|-----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| EHS Management                          | The SHE department will review the recommended corrective actions raised in the proposed or exiting EHS audits, assessment, and hazard and operability study (HAZOP), and prepare an implementation plan with responsible party, timeline, and budget. | <ul style="list-style-type: none"> <li>• IFC reviews the plan prior to the last disbursement.</li> <li>• All items in the plan are implemented by project completion.</li> </ul> |
| Wastewater Treatment                    | Atul monitors adsorbable organic halogen (AOX), benzene, ethylbenzene, toluene, xylenes (BETX) in the liquid effluents.                                                                                                                                | Prior to the last disbursement                                                                                                                                                   |
|                                         | Atul reduces the levels of total nitrogen, COD, and TSS, and meet all the WBG/IFC guideline limits for wastewater discharge.                                                                                                                           | <ul style="list-style-type: none"> <li>• Take actions – prior to the last disbursement</li> <li>• Meet all guideline limits – by project completion</li> </ul>                   |
|                                         | Atul takes practical methods to minimize the upset of the biological treatment process of the wastewater treatment plant to avoid the overflow of untreated wastewater.                                                                                | During project execution                                                                                                                                                         |
| Air Emissions and Ambient Air Qualities | Atul reduces the PM levels, and meet all the WBG/IFC guideline limits for air emissions.                                                                                                                                                               | <ul style="list-style-type: none"> <li>• Take action – prior to the last disbursement</li> <li>• Meet all guideline limits – by project completion</li> </ul>                    |
|                                         | Atul monitors the ambient air quality at its residential colony.                                                                                                                                                                                       | Prior to the last disbursement and there on                                                                                                                                      |
|                                         | Atul controls dust sources inside the plant and mitigates the dust generation by its raw material transportation.                                                                                                                                      | During project execution                                                                                                                                                         |
| Ambient Noise Level                     | Atul monitors ambient noise level at the residential colony                                                                                                                                                                                            | Prior to the last disbursement                                                                                                                                                   |
| Hazardous Waste Management              | Atul monitors all priority pollutant metals in the groundwater monitoring wells of the landfill.                                                                                                                                                       | Prior to the last disbursement                                                                                                                                                   |
|                                         | Atul improves the segregation of chlorinated and non-chlorinated organic wastes.                                                                                                                                                                       | During project execution                                                                                                                                                         |
|                                         | Atul disposes all the chlorinated wastes at the Ankleshwar incinerator until dioxins/furans monitoring results at Atul incinerator meet requirements.                                                                                                  | Prior to the commitment                                                                                                                                                          |

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|---------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
| Operation Hazard and Hazardous Materials    | Atul contracts consultants to conduct a quantitative risk assessment for the phosgene plant and submits the assessment report for IFC review.                                                     | Prior to the last disbursement       |
|                                             | Atul monitors BETX in the groundwater monitoring for the underground storage tanks.                                                                                                               | Prior to the last disbursement       |
|                                             | Atul provides defensive driving trainings for its own and contractor drivers.                                                                                                                     | During project execution             |
| Occupational Health/Safety                  | Atul reviews personal protection equipment (PPE) inventory, check the PPE effectiveness, and improve its PPE procedures for some critical processes, such as phosgene and chlorine manufacturing. | During project execution             |
|                                             | Atul enforces its OHS procedure, promote near-miss management, and reduce the recordable incidence rate.                                                                                          | During project execution             |
| Fire Prevention and Emergency Response (ER) | Atul conducts one off-site ER drill per year for mitigation of the potential toxic gas release or fire.                                                                                           | During project execution             |
|                                             | Atul involves the local hospitals for all the ER drills and releases related material safety data sheets (MSDS) to local hospitals.                                                               | During project execution             |
|                                             | Atul expands its ER trainings to cover nearby villages.                                                                                                                                           | During project execution             |