

Ruchi Soya – Corrective Action Plan

	Ruchi, Indore	GFL, Param	Patalganga Nagpur, Mangalore and Chennai	Haldia, Kandla, Kakinada	Kota, Shujalpur, Sriganganagar, Gadarwada Jabalpur
<p>Prepare Corporate Policy Statement Write a Ruchi policy statement for the food manufacturing elements of the organization (edible oils, vanaspati, and extractions) that clearly defines the Borrower's position (e.g. vision and mission and consumer relations) regarding production and product quality, environmental management, and occupational health and safety.</p>	Condition of first disbursement (Status: Completed)				
<p>Management Endorsement of Corporate Policy Obtain senior management endorsement of the policy statement; announce the existence of the management approved corporate policy and distribute the corporate policy to all employees and management staff and contractors. Conduct briefings at all food manufacturing plants in all divisions explaining the quality, environment and occupational health and safety policy and how it will be implemented and integrated through the creation of an integrated management system addressing production and product quality, environmental management and occupational health and safety.</p>	Condition of first disbursement (Status: Completed)				
<p>Conduct management system (e.g. ISO 9001) needs assessment. With external assistance conduct an audit of all Ruchi facilities (existing and acquisitions). The audit agency should be acceptable to IFC. Prepare an implementation Action Plan and a detailed schedule to integrate and to implement the corporate policy through the use of an internationally recognized integrated management system such as (e.g. ISO 9001-2000) that will facilitate systematic management of production and product quality, environmental management and occupational health and safety.</p>	Completed	Completed (GFL) Within 12 months of the first disbursement (Param)	Within 12 months of the first disbursement	Within 12 months of the first disbursement	Within 12 months of the first disbursement
<p>Implement integrated management system</p>	Completed	No later than 18 months after first disbursement	No later than 24 months after first disbursement	No later than 24 months after first disbursement	No later than 36 months after first disbursement
<p>Management System Certifications Obtain internationally recognized certification (e.g. ISO 9001-2000) of Ruchi production and product quality, environmental management and occupational health and safety management system for all Ruchi edible oil operations.</p>	Completed	Within 36 months of the first disbursement	No later than 36 months after first disbursement	No later than 36 months after first disbursement.	No later than 36 months after first disbursement.

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<p>Occupational Health and Safety Programs Audit With external assistance conduct an audit of occupational health and safety practices and programs at all Ruchi facilities (existing and acquisitions). The audit agency should be acceptable to IFC. The audit should include an assessment of hazardous materials management practices. The audit should define the gaps between existing operations and systematic management of occupational health and safety and hazardous materials management for operations as required by IFC Occupational Health and Safety and Hazardous Materials Management guidelines. The audit report should incorporate facility specific Corrective Action Plans detailing specific tasks required to close the gaps between existing operations and practices and IFC guideline requirements that were defined in the occupational health and safety and hazardous materials management audits. Completion dates for all corrective action items should not exceed the following.</p>	Completed	Contract awarded to qualified external auditor - Condition of first disbursement No later than six (6) months after first disbursement			
<p>Occupational Health and Safety and Hazardous Materials Corrective Actions Complete all occupational health and safety and hazardous materials management programs action items defined in the audit described in above in the Occupational Health and Safety Programs Audit.</p>	Completed	No later than six (6) months after first disbursement.	No later than 12 months after first disbursement.	No later than 12 months after first disbursement.	No later than 18 months after first disbursement.
<p>Energy Monitoring and Benchmarking Program Prepare an Energy Plan for each refinery and crushing plant (IFC will provide the format and the description of the requirements for Plans and committees). Create required energy committees in each plant and establish baseline use quantities. Assign corporate management sponsorship. Benchmark energy consumption with other Ruchi operations on a monthly, quarterly and annual basis. Promote competitions to reduce energy consumption per unit of product production.</p>	No later than 12 months after the first disbursement				
<p>Achieve HACCP Certification</p>	Completed	No later than 24 months after first disbursement			
<p>HACCP Audits and Certification With external assistance conduct an audit of existing consumer packaging operations Prepare an implementation Action Plan and a detailed schedule to achieve HACCP certification of all consumer product packaging operations. The audit agency should be acceptable to IFC.</p>	Completed	No later than 9 months after the first disbursement			

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<p>Facility Cleaning Institute continuous cleaning programs for Ruchi food manufacturing, packaging and storage activities. Provide adequate facilities, equipment and training for assigned employees. Clean oil, dust, and raw materials residues from floors, stairs and handrails, doors, walls, ceilings, etc. Modify employee training and service contract specifications to mandate clean-as-you-go practices in each shift in all operations. Maintain cleanliness consistent with food manufacturing facilities at all times.</p>	Completed	No later than 9 months after first disbursement.			
<p>Solid Waste Management Provide collection containers for accumulation and removal of solid wastes at the point of generation in all food manufacturing operations. Train employees and require contract employees to immediately clean up spills and to place wastes in collection containers. After each shift remove collected solid wastes to facility specific, assigned accumulation points for subsequent sale, off-site disposal or on-site management. Continuously manage solid waste in accordance with permitting requirements mandated by Pollution Control Boards.</p>	Completed	No later than 9 months after first disbursement.			
<p>Acquisition Due Diligence With external assistance audit management practices in quality, occupational health and safety, HACCP in food product packaging, facility cleaning, and waste management and discharges to the environment (air, water, storm water) for acquisitions. The audit agency should be acceptable to IFC. IFC will provide terms of reference.</p>	Contract awarded to qualified external auditor - Condition of first disbursement				
<p>Acquisition Due Diligence Action Plan Define required improvements in proposed acquisition; establish completion date for all corrective measures to comply with IFC policies and guidelines.</p>	No later than 3 month after disbursement				
<p>Annual Monitoring Report Reach agreement with IFC Environmental and Social Development Department on format for annual environmental performance report required by IFC investment contract. Provide formats to food manufacturing operations managers. Obtain agreement on format, content. Ensure that facility managers collect adequate data throughout the operating year to complete the annual reports for IFC.</p>	Condition of first disbursement				