

Packages Limited

Environmental and Social Action Plan

April 20, 2005

Greenfield Project, Kasur Site

| Item | Description | Completion Date |
|-------------|---|------------------------|
| 1 | Undertake an Environmental and Social Impact Assessment (ESIA) of the proposed new mill project. | June 2005 |
| 2 | Update this ESAP in accordance with the recommendations of the ESIA | July 2005 |
| 3 | Specify and install effluent treatment systems meeting the local and IFC requirements, and the recommendations of the ESIA. | June 2006 |
| 4 | Specify burners for power boilers capable of meeting local and IFC requirements for emissions to air of particulates, NOx and SOx, when firing gas or oil fuel. | March 2005 |
| 5 | Develop HR procedures for any existing employees unable to move to Kasur, and made redundant by this process. | June 2006 |
| 6 | Develop an integrated system to manage environmental and occupational health and safety issues. | December 2006 |
| 7 | Obtain certification of environmental and occupational health and safety management systems to ISO 14001 and OHSAS 18001 or equivalents respectively. | June 2009 |
| 8 | Develop hazardous materials management procedures fully in compliance with local requirements and IFC's hazardous materials guidelines | June 2006 |

Ongoing Operations, Lahore Site

| Item | Description | Completion Date |
|------|---|------------------------|
| 9 | Design an effluent treatment system capable of treating all site effluents arising after transfer of pulp and papermaking (except tissue manufacture) to Kasur to comply with local and IFC requirements. | August 2007 |
| 10 | Install and set into operation the effluent treatment system arising from Item 9. | December 2008 |
| 11 | Review technical options which would enable emissions of particulates, NO _x and SO ₂ from the existing diesel generators to be reduced to local and IFC standards. | December 2005 |
| 12 | Implement measures arising from Item 11, or if compliance with IFC standards cannot be reached phase out diesel engines. | June 2008 June 2012 |
| 13 | Measure emissions to air of VOCs from the flexible packaging printing operations. | June 2005 |
| 14 | If shown necessary by Item 13, develop and implement means to reduce VOC emissions to local and IFC guideline values. | December 2006 |
| 15 | Undertake an external audit of occupational health and safety management at the Lahore site. The audit should include a systematic OHS hazard analysis and should compare existing practices with IFC's OHS guidelines, and should recommend measures to enable Packages' OHS practices to achieve OHSAS 18001 or equivalent certification. | June 2006 |
| 16 | Implement recommendations arising from the OHS audit. | June 2007 |
| 17 | Enforce use of appropriate personal protective equipment (e.g. ear defenders, safety shoes) by all employees and contractors. | June 2005 |
| 18 | Install automatic safety shut-off valves in the gas supply line to the MAN steam boiler. | December 2005 |
| 19 | Review and upgrade as necessary the provision of machinery guards throughout the company. | December 2005 |
| 20 | Review and update as required OHS procedures covering hot work, lock-out-tag-out and erection of scaffolding. | June 2005 |
| 21 | Review all hazardous materials management procedures, and update as required to be compliant with local requirements and IFC's hazardous materials management guidelines. | June 2005 |