

KAPPA

Table 1 Environmental and Social Action Plan

April 6,

2006

Issue	Action	Completion Date
Social Policies	Systematize and formalize corporate procedures for (1) dealing with involuntary resettlement, indigenous peoples and cultural property and (2) maximizing local employment	June 2006
EHS Management System	ISO 14001 certification for all its operations	December 2006
	OSHAS 18001 certification for all its operations	December 2007
Liquid Effluents	For each site, list of actions to be implemented and timeframe to ensure effluents compliance with IFC requirements	May 2006
	Demonstrate that each site complies with the liquid effluents IFC requirements	December 2006
Occupational Health/Safety	For each site, list of actions to be implemented and timeframe to ensure that safety measures (i.e., double walls, leak prevention, channels to collect leaks, etc.) are implemented to comply with IFC requirements	May 2006
	Demonstrate that each site have installed safety measures in compliance with IFC requirements	December 2006
	List of actions to be implemented to ensure contractors, at all sites, comply with Kappa's EHS requirements	May 2006
Fire Prevention and Emergency Response	Demonstrate that upgrades to the emergency response equipment at all sites have been conducted	June 2007
	Schedule of the emergency drills to be conducted including relevant external stakeholders (i.e., community, hospitals, fire dept., etc)	May 2006