

SODRUZHESTVO
ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP)
21-SEPTEMBER-2007

Action Item	Detailed Description	Schedule
<u>1. Develop Management System for Environment, Social, and Health and Safety (ESHS)</u>	a) Develop policies and operational control procedures consistent with IFC Performance Standards requirements, including: <ul style="list-style-type: none"> • environmental and social assessment of project's further developments; • comprehensive ESHS performance monitoring for all its operations and those of associated facilities; • methods for communicating environmental and social aspects of current operations to local communities; • a mechanism to receive and respond to affected community concerns and complaints; • collaboration with third parties, which activity is essential for the successful operation of Sodruzhestvo, in relation to environmental and social aspects of their performance. b) Ensure implementation of operational control procedures consistent with national regulatory requirements and IFC Performance Standards	By July 30, 2008. Affirmative covenant and reporting requirement
<u>2. Provide a grievance mechanism for workers</u>	a) Develop, communicate and institute a grievance mechanism through which workers may raise workplace concerns other than to immediate supervisors.	Prior to 1 st disbursement
<u>3. Achieve continual compliance with air emissions and effluent discharge standards.</u>	a) Develop a monitoring program on emissions and ambient levels and agree it with IFC; b) Upon start-up of the plant, carry out measurement of agreed pollutants emissions and ambient levels. In the event of exceeding IFC's guidelines or Russian regulatory values, develop additional controls.	a) Prior to 1 st disbursement, submit program to IFC. b) Carry out measurements prior to 1 st disbursement and submit result to IFC. If necessary, develop additional controls and bring the levels within the IFC guideline or Russian

	<p>c) Carry out cumulative acoustic impacts measurements for households within railroad buffer zone (100 m). In the event of exceeding IFC's guidelines or Russian regulatory values, develop a program to mitigate adverse impacts on local population.</p>	<p>regulatory values within 6 months from the date of measurement. Affirmative covenant and reporting requirement.</p> <p>c) Carry out measurements prior to 1st disbursement and submit result to IFC. If necessary develop a program to mitigate adverse impacts on local population within 6 months from the date of measurement. Affirmative covenant and reporting requirement.</p>
<u>4 Solid waste management</u>	<p>a) Investigate project site to determine any potential contamination as the result of dredged spoil disposal;</p> <p>b) Provide evidence to IFC that other deposits of dredged spoils generated as the result of Sodruzhestvo's activity comply with Russian regulatory requirements;</p> <p>c) Implement sewage sludge and bleaching earth quality (physical, chemical and microbiological) characterization program to determine suitability for landfill disposal or beneficial reuse in compliance with local regulatory requirements and consistent with good international industry practice.</p>	<p>(a) Prior to 1st disbursement</p> <p>(b) By December 31, 2007. Affirmative covenant.</p> <p>(c) By December 31, 2008. Affirmative covenant.</p>