

DETROIT INVESTMENTS
ENVIRONMENTAL, HEALTH AND SOCIAL ISSUES CORRECTIVE ACTION PLAN (CAP)
JULY 20, 2006

#	Task Description	Indicator that Task is Complete	Required Completion Date
	JUICE PLANT		
1.	<u>Retrenchment program.</u> To develop a retrenchment program for the acquired plant compliant with the local regulations.	Program provided and agreed with IFC	3 months after acquiring the plant
2.	<u>Social and Environmental Affairs, Quality, and Occupational Health and Safety Management Policy Statement.</u> Develop statement of vision and mission for social (including labor practices) and environmental affairs, quality, and occupational health and safety management.	Provide copy of approved policy statement for IFC endorsed by highest-level management.	3 months after acquiring the plant
3.	<u>Environmental audit and corrective action plan for the juice plant.</u> To conduct an environmental audit and develop a corrective action plan for the acquired facility as part of the development of the reconstruction plan	Approved project reconstruction documentation provided including audit results and action plan (in English or in Russian)	6 months after acquiring the plant
4.	<u>Integrated Management System for Social and Environmental Affairs, Quality, and Occupational Health and Safety Management.</u> Establish an integrated, systematic management program based upon internationally recognized management systems such as ISO 9001-2000. Design the system to ensure compliance with Belarus regulations and IFC policies and guidelines requirements. This activity to be implemented according to a 4 stage process as follows: Stage 1 – Conceptual design of the management system Stage 2 – Detailed development of system procedures Stage 3 – Initial audit of all activities and installations (against standards defined in the system and as per established procedures) Stage 4 – Implementation of the management system	Stage 1 – provide copy of the report describing the management system to IFC. Stage 2 – Provide copies of procedures manual for IFC. Stage 3 – Provide IFC with list of all corrective actions required by the initial audit and detailed schedule. Stage 4 – Submit progress report demonstrating complete implementation of all procedures.	Stage 1 – upon commencement of juice production Stage 2 – upon commencement of juice production Stage 3 – 6 months after commencement of juice production Stage 4 – 12 months after commencement of juice production
5.	<u>Water use and effluent emissions audit.</u> To conduct an audit of water use and effluent emissions by qualified consultants to find ways to maximize the efficiency of water use and adequate capacity for liquid waste disposal.	Audit report provided (in English or Russian) and agreed with IFC	12 months after acquiring the plant
6.	<u>HACCP certification</u> Obtain HACCP certification for juice production.	Submit documentation demonstrating certification	18 months after starting juice production

#	Task Description	Indicator that Task is Complete	Required Completion Date
	DISCOUNT STORES		
1.	<u>Social and Environmental Affairs, Quality, and Occupational Health and Safety Management Policy Statement.</u> Develop statement of vision and mission for social (including labor practices) and environmental affairs, quality, and occupational health and safety management.	Provide copy of approved policy statement endorsed by highest-level management.	3 months after acquisition of first site
2.	<u>Retrenchment program.</u> To develop a corporate retrenchment program compliant with the local regulations that will be effectively applied to all acquired stores.	Program provided (in English or Russian) and agreed with IFC	3 months after acquisition of first site
3.	<u>Solid waste removal program.</u> To implement a solid waster removal program in order to maximize the recycling of recyclable waste from all stores.	Agreement(s) with contractor(s) on the removal and recycling of waste provided (in English or Russian)	6 months after acquisition of first site
4.	<u>Energy efficiency policy.</u> To develop an energy efficiency policy that will include energy efficiency audits of all acquired stores by qualified consultants acceptable to IFC and renovation/redesign plan according to their recommendations.	Policy provided (in English or Russian) and agreed with IFC	12 months after acquisition of first site
5.	<u>Fire protection and life safety policy.</u> To develop a corporate fire protection and life safety policy that will be effectively applied to all acquired stores. This policy should be developed in cooperation with independent technical consultants acceptable to IFC and will be compliant with the local regulations, international standards, and IFC guidelines. The policy should include the requirement for life and fire safety audits by qualified consultants acceptable to IFC of all newly acquired stores and development of their reconstruction and renovation plans according to the audit findings, local regulations and IFC requirements. Upon completion of reconstruction or renovation of the newly acquired stores the policy should include the requirement for certifications from the independent consultants of the compliance of completed reconstruction or renovation with the life and fire safety audit findings and recommendations.	Policy provided (in English or Russian) and agreed with IFC	12 months after acquisition of first site