

Electrotherm India Limited
Environmental and Social Action Plan
Date: March 10, 2007

#	Action	Palodia Plant	Samakhiyari, Kutch Plant
1.	Engage a reputed EHS consultant to undertake a third party Environment, Occupational Health and Safety (EHS) Audit	Appointed on March 05, 2007	Appointed on March 05, 2007
2.	Undertake a benchmark monitoring of work area environment quality, including for presence of dust and heavy metals, to demonstrate compliance with IFC environmental guidelines for occupational health and safety	Prior to commitment	Prior to commitment
3.	Complete third party EHS Audit and develop a Corrective Action Plan based on the results/findings/outcome of the third party EHS audit.	Prior to commitment	Prior to commitment
4.	Complete implementation of the Corrective Action Plan based on the results/findings/outcome of the third party EHS audit	October 2007	October 2007
5.	Appoint a fulltime appropriately qualified senior executive at the corporate level for oversight of EHS aspects across all of Electrotherm's operations	June 2007 (located at Kutch Plant)	
6.	Appoint qualified professionals as EHS manager at each of the operating locations/facilities	October 2007	-
7.	Implement EHS Management System certified to ISO 14001 and OHSAS 18001 standards with IFC Performance Standard requirements appropriately incorporated	October 2008	October 2008
8.	Undertake supplemental work on the REIA, acceptable to IFC, in accordance with IFC's PS 1 provisions.	-	Prior to the proposed public hearing
9.	Carry out a quantitative risk assessment (with domino effects and incorporating any potential exacerbation due to earthquakes) for the existing and proposed facility (including the risk on account of the proposed producer gas plant) at Samakhiyari;	October 2007	October 2007
10.	Prepare and implement an onsite and offsite emergency and disaster management plan based on outcome of the QRA and link it to the district emergency response plan	December 2007	December 2007
11.	Develop and implement EHS standards for contractors, their sub-contractors, as also all contract/casual workers and ensure adherence to the EHS standards during construction and operation	October 2007	October 2007
12.	Obtain Ministry of Environment and Forests (MoEF), Government of India (GoI) Clearance	-	As per MoEF, GoI notification
13.	Develop and communicate to employees a documented human resources policy manual, which is consistent with IFC PS 2 provisions.	June 2008	June 2008

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14.	Develop and implement an employee grievance redress procedure consistent with PS2 provisions	October 2007	October 2007
15.	Develop and implement a disciplinary procedure consistent with PS2 provisions	October 2007	October 2007
16.	Develop and implement a maternity leave and benefits policy in accordance with host country requirements	October 2007	October 2007
17.	Prominently display the Standing orders in the local language at each of its plant locations	June 2007	June 2007
18.	Develop and implement procedures to ensure that the labor contractors; and the Company's conversion agents/contract manufacturers, meet national labor laws particularly with regard to age, wages and statutory deductions.	March 2008	March 2008
19.	Put in place a departmental, plant and corporate level safety committee comprised of both management and worker representatives.	June 2007	June 2007
20.	Develop an action plan to meet IFC air emission limits from all stacks connected to baghouse and cyclone separator/bag filter systems at the Kutch plant	-	Prior to first disbursement
21.	Monitor air emissions at the Kutch plant, to demonstrate compliance with IFC requirements and if required, within the first year after disbursement, implement appropriate corrective measures to meet IFC requirements.	-	June 2008
22.	Implement a companywide program on rainwater harvesting	June 2008	June 2008
23.	Design and construct all waste water treatment facilities to meet IFC treated effluent requirements	-	June 2008
24.	Upgrade management of hazardous materials and wastes to be in accordance with good industry practices and IFC guidelines on hazardous materials management	December 2007	December 2007
25.	Develop and Implement a boiler Bottom Ash Disposal Management Plan. The program shall define: appropriate selection criteria for land to be used for filling with bottom ash; prohibited fill and disposal areas and techniques; and criteria for compaction, drainage and final cover	-	September 2008
26.	Implement measures to ensure and demonstrate that SPM in ambient air on Kutch plants premises remains below 200 µg/m ³	-	September 2008
27.	Implement measures to ensure that the SO ₂ levels on Kutch plant premises remains below 80 µg/m ³	-	September 2008
28.	Implement a program to monitor ambient air quality at the Kutch plant to demonstrate compliance with IFC ambient air quality requirements.	-	June 2007

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29.	Provide acoustic enclosures for high noise generating equipment like turbine/generators, diesel generator sets, compressors and other high noise generating equipment and also design the foundations in a manners so as to minimize vibrations and noise	December 2007	June 2008
30.	Make available to IFC record notes of the public hearing conducted for obtaining environmental clearance for the project proposed at the Kutch plant.	-	Within one month of the public hearing date
31.	Make available to IFC a brief discussion note on the public hearing describing: the key concerns raised by members of the local communities; how the Company proposes to address these community concerns in Project design and implementation; and how has the Company communicated/provided feedback to the local communities, information on the remedial measures proposed to be implemented in response to the concerns expressed by members of local communities.	-	Within 7 days of the public hearing date
32.	Develop and implement a Security Personnel procedure, consistent with IFC Performance Standard 4 provisions	October 2007	October 2007
33.	Develop and Implement, as part of the EHSMS, a community engagement and grievance redress procedure for receiving and responding to community complaints	October 2008	October 2008
34.	Make available to IFC copies of all consents/permits/authorizations/clearances as soon as these become available.	-	As soon as available with the Company