

Environmental and Social Action Plan (ESAP)

Strominvest and Erilin

Date: March 19, 2007

Item	Description	Due Date
1	Recruit or contractually require retention of a suitably skilled manager for environmental, occupational health and safety within the facilities management services.	Upon commissioning of the building
2	Develop environmental, social and occupational health and safety management systems consistent with IFC's Performance Standards and to the requirements of ISO 14001 and OHSAS 18001 respectively or equivalent, including: • a mechanism to receive and respond to comments of the public; • occupational health and safety of tenants and visitors, including life and fire safety; • waste and hazardous materials management; • energy and resource efficiency.	Commissioning of the building + 1 year
3	<u>Borrower (Erlin):</u> A) Include labour and employment requirements in Management Services Agreement (MSA) for employees or contractors of the management services contractor to require compliance with the relevant laws of Belarus and with IFC Performance Standard 2, including: 1) Develop and implement a human resources policy and procedures in line with PS2 and national legislation; 2) Implement an effective grievance mechanism; 3) Provide training programs on PS2 and other labor related issues to management and workers' representative within 6 months after entering into the MSA; 4) Encourage formation by workers of a representative committee(s) to interact with management on a regular basis regarding issues pertaining to workplace conditions and terms of employment; 5) Ensure the workers have a place to gather and discuss issues; 6) Create a position of worker liaison within management. B) Monitor the MSA contractor's compliance with clause 3 (a) above, through the commissioning of an independent labor assessment six months after entering into the MSA, and as required thereafter, and report these findings to IFC.	A) Upon entering into the MSA B) 6 months after entering into the MSA

4	<u>Guarantor (Strominvest):</u> A) Develop workers committees which can deal with specific labor issues; B) Provide an effective grievance mechanism consistent with PS2 requirements; C) Include labour and employment requirements in construction contracts to require compliance with the relevant laws of Belarus and with IFC Performance Standard 2; D) Commission an independent assessment of compliance of its labor policies and practices with PS2.	(A,B,C) September 2008 (D) If ownership of the Project building is not transferred to the Borrower before December 31, 2008.
5	A) Prepare Life and Fire Safety (L&FS) Master Plan and commission a fire safety expert acceptable to IFC to review it and certify to IFC and to the company that requirements of IFC guidelines are met. B) On the conclusion of fire safety expert's review agree on the scope of work if any for a Corrective Action Plan (CAP) and a time frame for CAP implementing to meet the requirements of IFC L&FS guidelines. C) Implement CAP to meet IFC L&FS guidelines.	(A) Condition of disbursement; (B) Condition of disbursement (C) In accordance with CAP timing