

Assan Aluminyum (26648), Environmental and Social Action Plan – February 11, 2009

Item	Action	Completion Indicator	Timetable
PS1: Social and Environmental Assessment and Management Systems			
1	Assan will develop and maintain an environmental permit register for all its companies.	Assan has developed the environmental permit register and submitted it to IFC, together with the Annual Monitoring Report (AMR) or the project.	First AMR submittal in the first quarter of 2009.
2	Assan will develop an ISO 14001 and OHSAS 18001 management system for Dilovasi Plant.	Assan has obtained ISO 14001 and OHSAS 18001 certifications for Dilovasi Plant.	December 2009.
3	Kibar Holding will review their organization to create a corporate HSE management function to ensure consistent HSE approach throughout its plants.	Kibar Holding has created a corporate HSE function.	December 2009.
PS2: Labor and Working Conditions			
4	Assan will ensure its Human Resources Policy makes reference to the right of freedom of association. The policy will be published at all plants, specifying rights and duties as an Assan employee and management staff.	Revised Policy provided to IFC and evidence presented that it has been published at all plants.	COD
5	Assan will ensure its Human Resources Policy confirms that the Company is an equal opportunity employer and does not make employment decisions on the basis of personal characteristics unrelated to inherent job requirements	Revised Policy provided to IFC and evidence presented that it has been published at all plants.	COD
6	Assan will make visible in the workplace standardized statements of core labor standards, in a manner easily understandable by workers;	Evidence of publication presented to IFC.	COD
7	Assan will train all employees on Human Resources Policy and rights and duties of Assan employee. This will include material on the right of freedom of association	(i) Training done at all plants. (ii) Labor Audit to confirm presence of freedom of association undertaken by a third party.	(i) April 31 st , 2009 (ii) July 31 st , 2009
8	Assan will update their Working Conditions and Terms of Employment regarding the following actions. (i) Action 1: Obtain working license from the local government in Tuzla site. (ii) Action 2: Obtain working permission from	(i) Assan present working license to IFC (ii) Assan present working permission to IFC (iii) Assan present government's approval regarding shift	(i) January 31 st 2009 (ii) April 31 st 2009 (iii) December 31 st 2009

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	the municipality in Tuzla site. (iii) Action 3: Inform government regarding shift work in Tuzla site. (iv) Action 4: Annual leave days should be completely used by all employees each year. (v) Action 5: Employees not to exceed legally allowed working hours per day and per night. (vi) Action 6: Guarantee weekly rest days for all employees.	working to IFC (iv) Annual leave records (v) Time records (vi) Time records	(iv) December 31 st , 2009 (v) December 31 st , 2009 (vi) December 31 st , 2009
9	Assan will ensure that worker representatives are elected by employees in all plants. (i) Train workers on worker representatives' rights and duties. (ii) Election of worker representative in Dilovasi plant.	(i) Assan present the training program done. (ii) Present election records and description of election process.	(i) July 31 st , 2009 (ii) December 31 st , 2009
10	Assan will ensure that all work contracts are signed by the employer in Tuzla site.	Signed work contracts	December 31 st , 2008 - Completed
11	Assan will ensure in-house subcontracting companies have complied with working conditions and terms of employment requirements. (i) Develop labor requirements and include them as covenants in contracts with all contractors and subcontractors. (ii) Implement monitor plan to ensure compliance of contractors and sub-contractors with labor requirements. (iii) Audit contractors and subcontractors on labor requirements.	(i) Code of conduct included in all contracts. (ii) Assan have developed the workplace monitoring plan. IFC has reviewed and accepted it. (iii) Assan have audited its contractors and subcontractors, as needed.	(i) February 28, 2009 (ii) July 31 st , 2009 (iii) December 31 st , 2009
12	Kibar Holding will ensure that medical staff and technical resources are consistently allocated in its plants.	Kibar Holding has reviewed organization of medical emergency / infirmity services at all plants and provided additional resources, as needed.	March 2009 - Completed
13	Kibar Holding will hire external qualified consultants, acceptable to IFC, to conduct	Kibar Holding has submitted the consultant's report and the relevant corrective action plan to IFC and IFC has reviewed and	a) Assessment workplan: COD. b) Submittal of assessments and

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	occupational safety and comprehensive fire and explosion safety assessments at Dilovasi and Kartal plants and develop an action plan, as needed. Assan will review the operations in Tuzla according to the findings of these assessments and measures will be taken as necessary.	approved it.	corrective action plan within three months from workplan approval. c) Implementation of corrective actions as per agreed time schedule.
14	Assan will develop and implement work permits and lock-out tag-out procedures to cover semi-routine and non-routine works on manufacturing equipment, chemical and energy lines and other operations presenting high risk such as confined space entry, work at height, hot work etc., involving both staff and contractors.	Assan has developed the procedures. IFC has reviewed and accepted them.	As soon as possible, but not later than March 2009.
15	Assan will revise the configuration of the new induction furnace at Dilovasi to ensure adequate protection of workers. The design of a molten metal transfer system for transporting liquid metal from induction furnace to melting furnaces will be reviewed.	a) Assan has prepared a corrective action plan and submitted it to IFC for review and approval. b) Assan has implemented the agreed action plan.	a) Corrective action plan: COD b) Implementation of corrective actions as per agreed time schedule.
16	Kibar Holding will ensure that safety of coil deposits at Tuzla, Dilovasi and Kartal plants is reviewed and adequate safety measures consistently implemented.	Kibar Holding has implemented the required measures in all coil deposits in Tuzla, Dilovasi, and Kartal.	COD.
17	Assan will develop a workplace monitoring plan in its plants.	Assan has developed the workplace monitoring plan. IFC has reviewed and accepted it.	December 2008.
18	Assan will review current practice for personal protective equipment (PPE) use and ensure enforcement, especially for hearing protection.	Assan has audited its staff on PPE use and enforced the use of hearing protection, as needed.	December 2008.
	PS3: Pollution Prevention and Abatement		
19	The modernization and upgrade project at Dilovasi plant will allow enhancing the air emission levels and meeting the IFC guidelines. Assan will develop and implement an air emission monitoring	a) Assan has developed the air emission monitoring program. IFC has reviewed and accepted it. b) Assan has regularly implemented air emission monitoring and	a) December 2008. b) First monitoring conducted within three months after approval of the plan.

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	program to verify compliance with IFC guidelines. The monitoring approach will be made consistent for all plants.	verified compliance with IFC guidelines. Corrective actions have been identified, as needed.	Results submitted annually in the AMR.
20	Assan will install closed-loop water circuits with neutralizing and treatment systems to minimize water use and discharge at Dilovasi plant. Hot water hot spray no-detergent degreasing and cleaning section will be installed on the new tension leveller, which is expected to eliminate the need for use of chemical additives and therefore to cause zero discharge.	Assan has installed the equipment and provided an as-built report to IFC.	December 2010.
21	Assan will review and revamp, as needed, the industrial and biological wastewater treatment scheme at Dilovasi plant, to ensure that it meets applicable IFC guidelines. A disinfection unit will be added, as needed.	Assan has reviewed the scheme and revamped treatment units, as needed. Assan has provided an as-built report to IFC.	December 2009.
22	Assan will review the existing waste storage and sludge storage facilities at all plants, and will implement an upgrade program to ensure that they are adequately contained, covered and protected from third party entry.	Assan has implemented the upgrade program and has provided an as-built report to IFC.	December 2009.
23	Assan will assess eventual presence and implement safe removal / disposal, as needed, of internationally banned/regulated hazardous chemicals including asbestos, PCBs, and CFCs in its facilities undergoing dismantling / revamping and modernization operations at Dilovasi plant.	Assan has implemented a survey of the eventual presence of the substances in its facilities and developed a corrective action plan as needed. IFC has reviewed and accepted it.	Three months after first disbursement.
24	Assan will annually quantify and report direct and indirect GHG emissions, in accordance with internationally recognized methodologies.	Assan has reported GHG emissions in its AMR to IFC.	According to AMR submittal schedule.
	PS4: Community Health, Safety and Security		
25	Assan will include seismic safety criteria in the design and relevant responses considered in the	Assan has provided assurance about the use of seismic design criteria and adoption of relevant measures in the emergency	COD.

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	emergency plans.	action plans, including community safety.	
26	Assan will review its relevant loading/unloading procedures and facilities and implement best practices to ensure transport safety.	Assan has reviewed relevant procedures and facilities and developed an action plan, as needed. IFC has reviewed and accepted it.	Three months after first disbursement.