

Environmental and Social Action Plan
Snowman Frozen Foods Private Limited
Snowman II # 26688
Date: August 14, 2009

| # | Environment/Social Action Plan | Deadline |
|--|--|-----------------------------|
| <i>Social and Environmental Management System</i> | | |
| 1. | Implement procedures and measures to stop open pit burning of waste, engage a consultant to undertake a contaminated land study at each cold storage site; and to develop and agree with IFC, an action plan based on the outcome of the study for remediation of identified contamination. | Prior to commitment |
| 2. | Engage a consultant for development and implementation of a companywide applicable ISO 14001 certified Environment Management System with IFC Performance Standards appropriately incorporated. | Prior to first disbursement |
| 3. | Complete implementation of the companywide applicable ISO 14001 certified Environment Management System | March 2010 |
| 4. | Develop and implement procedures and facilities to: obtain authorization under hazardous waste rules; store hazardous wastes within secondary containment; document and record quantities of hazardous waste generated and disposed; and dispose of the hazardous waste only through authorized entities | Prior to first disbursement |
| 5. | Put in place a community engagement and grievance redress mechanism | October 2009 |
| 6. | Develop and implement a security personnel procedure for ensuring that: past records of security personnel employed is screened; security personnel have clear objectives and permissible actions laid out; security personnel are trained in avoidance of human rights violations, use of fire arms and handling various situations with clear procedures; security incidents are recorded, investigated and corrective action implemented; bonafide complaints against security personnel are investigated/disciplinary actions implemented; and there is a grievance mechanism for aggrieved members of community or employees, in the event of a violation of the code for security personnel. | October 2009 |
| 7. | Put in place a company-wide policy to acquire land in accordance with PS5 provisions as applicable. | October 2009 |
| <i>Labor Working Conditions</i> | | |
| 8. | Upgrade labor policies, procedures and practices to ensure compliance with statutory requirements pertaining to contract labor wages, overtime, documentation, and wage slips. | Prior to approval |
| 9. | Display provisions of contract labor act at all the facilities | September 2009 |
| 10. | Make available appropriate provisions, amenities and facilities for contract labor at each warehouse/cold storage location. | December 2009 |
| 11. | Review and upgrade the HR Policies on casual leave, maternity leave and service certificate in the context of relevant laws, rules, regulations and model standing orders. | Prior to first disbursement |
| 12. | Review and detail the disciplinary action procedure in accordance with applicable statutory requirements and IFC's PS2 provisions. | Prior to first disbursement |
| 13. | Review and upgrade the employee grievance redress procedure in accordance with IFC PS2 provisions including: provisions for confidentiality protection and non retribution; expanding its scope to include contract workers; definition of response | Prior to first disbursement |

| # | Environment/Social Action Plan | Deadline |
|------------------------------------|--|-----------------------------|
| | timelines at various stages of the procedure; and documentation of grievances received and redressed. | |
| 14. | Articulate and embed an Equal Opportunity and Non Discrimination Policy as part of the HR Policies and Procedures | Prior to first disbursement |
| 15. | Review and upgrade occupational health and safety procedures including for: provision and use of step ladders; defensive/safe driving procedures and training of drivers (including contract drivers) in defensive driving; awareness on healthy work practices including HIV/AIDS prevention; transportation emergency response and management; and best practice for worker maximum exposure to low temperature (-18 deg. C) conditions. | October 2009 |
| 16. | Finalize the Emergency Response Procedure and display it; put in place emergency response committees and team; and train all employees on emergency preparedness and response. | October 2009 |
| <i>Pollution Prevention</i> | | |
| 17. | Put in place appropriately contained facilities for diesel and lubricant storage. | December 2009 |