

Altyn-Ajydar III (26690), Environmental and Social Action Plan – May 13, 2008

Item	Action	Completion Indicator	Timetable
PS1: Social and Environmental Assessment and Management Systems			
1	Altyn-Ajydar will apply for the Ecological Passport for the Project's facilities and provide regular updates to IFC on the status of all permits for the Project.	Altyn-Ajydar has obtained its Ecological Passport for the new production lines, and provided it to IFC.	By September 2008. If events beyond the Company's control cause delay, the Company will inform IFC in a timely manner and provide an expected date for permit issuance.
2	Altyn-Ajydar will staff the Occupational Safety and Environmental Unit with qualified professionals, initially consisting of an environmental specialist and a safety inspector. The medical staff (a doctor and two nurses), which will be hired, will report to the Head of the Unit.	Altyn-Ajydar has staffed the Unit and hired the medical staff and has provided IFC with the new organization chart.	By six months after first disbursement.
3	Altyn-Ajydar will formalize an EHS training plan, detailing internal and external training components, management roles and responsibilities, trainers, job functions attending the various training components, and relevant frequencies	Altyn-Ajydar has prepared and submitted the plan to IFC and IFC has reviewed and accepted it.	By one year after first disbursement
4	Altyn-Ajydar will continue to provide updates on the implementation of the Corrective Action Plan (CAP), dated February 7, for Project Altyn-Ajydar II (23593).	Altyn-Ajydar has provided to IFC regular updates on the CAP in the Annual Monitoring Reports (AMRs), for actions which are not superseded by new actions listed in this Environmental and Social Action Plan.	As per CAP time frame
PS2: Labor and Working Conditions			
5	An independent labor assessment will be performed to review employment policies and their compliance and identify areas of improvement to improve firm's performance.	a) The assessor has submitted the draft labor assessment report, including a draft Induction Manual for the new recruits and the scope of work of a Corrective Action Plan and a time frame for implementing the changes, to both Altyn-Ajydar and IFC. Both parties have reviewed it and the report has been finalized.	a) Draft report to be submitted by three months after first disbursement. b) Corrective action plan to be completed and agreed, as needed, within three months from assessment report finalization.

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		b) The corrective action plan has been agreed between Altyn-Ajdar and IFC, as needed.	
6	Altyn-Ajdar will develop a formal internal grievance management policy and relevant implementation procedures.	As part of the labor assessment.	See Action 5.
7	Altyn-Ajdar will ensure that adequate and sufficient PPE, including protective clothing, hearing protection devices, protective gloves against cuts, safety boots, is provided to all workers involved in the production units, according to their functions and occupational risk profile, and its use is enforced. The Company will install adequate safety signage at all its facilities.	Altyn-Ajdar has provided and enforced the use of PPE, and has installed safety signage. The Company has provided photographic documentation relevant to all production units.	Condition of second disbursement.
8	Altyn-Ajdar will ensure that hydrants are clearly identifiable and not obstructed, and that emergency drills, inspections and functional tests for the hydrants are conducted and recorded.	Altyn-Ajdar has provided to IFC regular updates on the fire safety inspection program in the Annual Monitoring Reports (AMR).	First update in the 2008 AMR.
9	Altyn-Ajdar will develop an emergency preparedness and response plan to address all potential accidental scenarios associated with its activities, including scenarios potentially involving external receptors.	Altyn-Ajdar has prepared and submitted the plan to IFC and IFC has reviewed and accepted it.	By December 2008.
10	Altyn-Ajdar will audit its facilities in order to determine OHS hazards associated to each new production line, existing corrugated cardboard and packaging plant and ancillary facilities, and identify corrective measures both in terms of improvements to the equipment and in terms of personal protection needs. The audit will also cover hazardous material storage, handling and transport practice and procedures.	a) The qualified OHS protection engineer has submitted the draft audit report, including the scope of work of a Corrective Action Plan and a time frame for implementing the changes, to both Altyn-Ajdar and IFC. Both parties have reviewed it and the report has been finalized. b) The Company has implement such corrective measures as the audit shows to be necessary	a) Draft report to be submitted by six months after first disbursement. b) Corrective measures implemented according to the agreed time frame.

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11	Altyn-Ajydar will install, in its new administrative building, adequate and modern facilities for its workers. Additional modern facilities will be installed at the new aluminum panel and tempered glass/window frame units.	Altyn-Ajydar has provided the layouts of the facilities and relevant photographic documentation.	By the end of the construction activities at the facilities, but not later than June 2009.
	PS3: Pollution Prevention and Abatement		
12	Altyn-Ajydar will install flowmeters to measure water pumped from the well and discharged to the sewer.	Altyn-Ajydar has installed the flowmeters and provided quantitative measurements in the AMRs.	Install flowmeters by December 2008.
13	Altyn-Ajydar will conduct improvement works at the wastewater treatment unit to improve treatment, maximize water recycling and further reduce water consumption. The Company will start monitoring of water discharges both in terms of quantity and quality, to develop a baseline for the new facilities and expanded production lines.	a) Altyn-Ajydar has improved its unit. b) Altyn-Ajydar has started quarterly monitoring of water discharges.	a) By December 2008. b) By March 2009.
14	Altyn-Ajydar will develop a waste register to adequately record volumes of the different waste streams which are reused, recycled or disposed of.	Altyn-Ajydar has developed and submitted the register to IFC as part of the AMRs.	First updated register presented in the 2008 AMR.
15	Altyn-Ajydar will test the equipment potentially associated with PCB and ensure that PCB-free equipment is installed at their facilities and PCB-contaminated equipment is progressively phased-out.	Altyn-Ajydar has tested the equipment and submitted the results to IFC. Equipment phasing out has been documented in the AMRs, as needed.	Testing performed by June 2009.

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	PS4 Community Health, Safety and Security		
16	Altyn-Ajydar will ensure that all security guards are annually trained by an external certified body to maintain high levels of technical and professional proficiency, particularly with regard to local use of force and appropriate use of firearms.	Altyn-Ajydar has provided to IFC regular updates on the security training program in the AMRs.	First update in the 2008 AMR.