

Environmental and Social Action Plan
Polycab Wires Private Limited
Polycab Project # 26794
Date: May 20, 2008

#	Environment/Social Action Plan	Deadline
1.	(a) Appoint a consultant for implementation of ISO 14001 and OHSAS 18001 certified Environment, Occupational Health and Safety Management System (EHSMS) (b) Develop an action plan for implementation of the EHSMS (c) Complete implementation of a EHSMS certified to ISO 14001 and OHSAS 18001 standards, with IFC's Performance Standards incorporated in the EHSMS	Prior to commitment/ signing of the agreement Prior to disbursement December 2009
2.	Appoint/designate a fulltime appropriately qualified senior executive at the corporate level for oversight of ESHS aspects across all of Polycab's operations	Prior to disbursement
3.	Appoint/designate qualified professionals as ESHS managers at each of the operating locations/facilities	Prior to disbursement
4.	(a) Undertake a benchmark monitoring of stack emissions from the aluminum furnace; (b) Work area environment quality, including for presence of VOCs, dust, heavy metals and exposure to electromagnetic fields, to demonstrate compliance with IFC guidelines (c) Based on the outcome of benchmark monitoring of stack emissions and work area environment quality, develop an action plan to meet IFC EHS Guideline requirements (d) Implement the mitigation measures identified in the action plan	Prior to commitment/signing of the agreement Prior to disbursement Prior to Disbursement Within 12 months of commitment
5.	Make available to IFC relevant and valid consents/clearances/permits/authorizations for each of its operating facilities including those pertaining to environment, occupational health and safety and other related aspects.	Prior to commitment/signing of the agreement
6.	(a) Based on the outcome of the Phase I audit (referred to in the ESRS and undertaken based on document review of one facility and discussions with management team, to identify potential opportunities for improvement of labor policies and practices in the context of applicable labor laws and IFC's Performance Standard 2 requirements), finalize and agree with IFC an action plan to mitigate identified variances from Performance Standard 2 provisions (b) Undertake Phase II of the labor audit (referred to in the ESRS and which will include document review across all of Polycab's operations, interviews with site management, contractors, workers and contract labor at each facility, to identify potential opportunities for improvement of labor policies and practices in the context of applicable labor laws and IFC's Performance Standard 2 requirements) and agree with IFC an action plan based on the outcome of the Phase II labor audit.	Prior to IFC Board approval Prior to commitment/signing of the agreement

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	(c) Implement the mitigation measures identified in both Phase I and Phase II action plans	As per the time schedule agreed with IFC and detailed in Phase I and Phase II action plans.
7.	Develop and implement EHS procedures and guideline document including an audit process for contractors at the factory, their sub-contractors as also contract/casual workers and ensure adherence to IFC's Performance Standards and EHS guidelines during construction.	December 2008
8.	Put in place plant level and corporate safety committees, comprised of both worker and management representatives, across all of the Company operations.	December 2008
9.	Develop and Implement a security personnel procedure in accordance with IFC's PS 4 provisions and as described in the ESRS	December 2008
10.	Develop hazardous materials and hazardous waste management procedure Implement the procedure including construction of facilities for handling and storage of hazardous materials and hazardous wastes.	Prior to disbursement December 2008
11.	Benchmark testing of drinking water quality at each of the Company's operating facilities to assess compliance with host country potable water standards Where drinking water quality does not comply with Indian potable water standards, implement measures to meet the standards	Prior to commitment/signing of the agreement Within 6 months of commitment