

Hikal Limited
Environmental and Social Action Plan

Date: July 3, 2008

Item	Description	Due Date	Deliverables
1	Revise the existing management system documentation for all facilities to explicitly address contractors, with special reference to transportation and construction contractors to be in compliance with IFC Performance Standards 2 and 3.	Condition of disbursement	Copies of revised management system documentation
2	Revise site ESMs to address changes in operations that will be a result of expanded operations	Within 3 months of start up of new operations	Copies of revised management system documentation
3	Develop monitoring and audit program for on-going construction activities to ensure compliance with mitigation measures outlined in Rapid EIA and IFC PS2.	By 30 September 2008	Copies of monitoring and audit procedures and supporting documents
4	Undertake a comprehensive review of the IFC Performance Standard 2 on labor and working conditions vis-à-vis its existing practices and incorporate any changes required, into its operational practices and HR systems and practices to make it compliant with the IFC requirements.	Condition of disbursement	Report on internal review of PS2 vis-à-vis the company's operations, identified gaps and proposed measures with definite timeline.
5	Review and make necessary changes monitoring program for emissions and effluent to ensure compliance with the tables in the IFC's relevant industry sector guidelines.	Condition of Disbursement	Revised monitoring plan for all its sites in line with the requirements of IFC's relevant industry guidelines
6	Undertake monthly monitoring of effluent while it is being discharged to the common ETP till the time new ETP is operational (in Jigani, and any other similar cases)	Condition of disbursement	Copies of monitoring records.
7	Develop a documented procedure as a part of its management systems supplemented by necessary training modules for the drivers and fleet contractors on safe transportation of hazardous chemicals and regular training will be conducted for them.	Within 3 months of disbursement	Submit the documented procedure, training modules and records for the fleet contractors and drivers on the safe transportation of hazardous chemicals

