

SunEdison (#28053)

Environmental and Social Action Plan

No.	Action	Deliverables	Due Date
1.	Implement a corporate-level ESHS-MS for all its operations based on: the regulations of the host countries; IFC PSs; relevant WBG EHS Guidelines; and MEMC/SunEdison's corporate ESHS-MS and Worldwide Guidelines and Policies. The ESHS-MS will be designed in line with internationally recognized ESHS-MS standards (i.e. ISO 1400 and OHSAS 18000)	Copy of EHS-MS Procedures/Manual	December 15, 2011
2.	Implement a Contractor Monitoring Procedure and include relevant clauses in contracts for: compliance with national ESHS regulations and labor laws, working conditions, compliance with requirements of ESHS-MP, IFC PSs, and relevant WBG EHS Guidelines. This should include specific clauses regarding workers accommodations in line with internationally recognized guidelines (i.e. Workers' accommodations processes and standards by IFC and EBRD - http://www.ifc.org/ifcext/sustainability.nsf/AttachmentsByTitle/p_WorkersAccommodation/\$FILE/workers_accomodation.pdf)	Copy of Contractor Monitoring Procedure and sample of ESHS contract clauses	Condition of 1st Disbursement
3.	Conduct a rapid audit of workers accommodations at current sub-project sites in India and implement corrective actions to fill gaps, if any.	Copy of audit report and documented evidence of implementation of corrective actions.	Condition of 1st Disbursement
4.	Establish a formal documented procedure for water management & water quality monitoring applicable to all sub-projects	Copy of documented procedure as a part of ESHS-MS	December 15, 2011
5.	Implement the ESHS-MP resulting from the ESIAs for the sub- projects in India.	a. Copies of the Final ESIAs b. Evidence of ESHS-MP implementation (e.g. ESHS contractor reports)	a. Condition of 1st Disbursement b. December 15, 2011
6.	Develop corporate-level Human Resources (HR) Policy and Procedures based on the existing MEMC/SunEdison HR Manual and IFC PS2 requirements.	Copy of HR Policy and Procedures	Condition of 1st Disbursement

7.	Develop country-specific HR Manuals adapted to local regulations for each one of its host countries.	Copy of country-specific HR Manuals for India and Thailand	December 15, 2011
8.	Develop a corporate-level Community Engagement Framework (CEF) in line with PS1 and good international practices	Copy of the Community Engagement Framework (CEF)	December 15, 2011
9.	Develop a Community Safety Plan aligned with PS4 for SunWat 1 – Saraburi	Copy of Community Safety Plan	Condition of 1st Disbursement
10.	Develop a Land Acquisition Protocol in line with PS5	Copy of Land Acquisition Protocol	December 15, 2011
11.	Develop a Chance Find Procedure (Cultural Heritage) in line with PS8	Copy of Chance Find Procedure	December 15, 2011