

Environment & Social Action Plan Pulkovo Airport

The Company commits to the actions as specified below, within the specified deadlines, and declares that the resources specified below have been allocated

<u>Issue</u>	<u>Proposed Actions</u> (Mitigation, Management, Monitoring, and Methods)	<u>Target Completion Date</u> ("LA" – loan agreement)
Social and Environmental Assessment and Management System	Develop and implement a Stakeholder Engagement Plan, including grievances procedure	3 months after Effective Date of PPPA
	Conduct Environmental Baseline Survey to identify potential historical contamination at the airport site	Before signing LA
	Develop and agree with the City of St. Petersburg a clean-up plan for historical contamination based on the Baseline survey	Before signing LA
	Adopt a Construction Environmental Management Plan	Upon signing EPC contract
	Prepare EIA (OVOS) and obtain construction permit	Before starting construction
	Prepare an Environmental and Social Policy	3 months after signing LA
	Compile an inventory of all hazardous substances used in the airport operations along with their locations and prepare Hazardous Substances Management Plan	3 months after signing LA
	Ensure that all local permits are current and updated to a new corporate entity as a part of a transition process	6 months after signing LA
	Undertake an audit of all hazardous materials storage areas within the concessions areas and leased areas to identify those requiring upgrades and develop and implement upgrades plan	6 months after signing LA
	Implement an Environmental Management System (EMS) compliant with ISO 14001	36 months after signing LA
Labor and Working Conditions	Develop Human Resource policy compliant with the local laws and IFC requirements	3 months after signing LA
	In case of retrenchment, develop retrenchment plan(s) in compliance with IFC requirements	3 months after signing LA
	Develop and implement an occupational health and safety (OHS) management system compliant with the requirements of OHSAS 18001	24 months after signing LA

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Pollution Prevention and Abatement	Develop and receive state approval for results of a Sanitary – Protection Zone study	Before signing LA
	Develop a waste management plan for construction	Upon signing EPC contract
	Develop and action plan for clean-up of used storage areas and other waste areas	6 months after signing LA
	Develop an action plan for ensuring the compliance with international food waste disposal measures	6 months after signing LA
	Develop air monitoring program	6 months after signing LA
	Prepare an inventory of GNG emissions in the import	6 months after signing LA
	Prepare a drainage and waste and run-off water treatment Master Plan	6 months after signing LA
	Develop and implement a noise management program based on noise modeling	6 months after signing LA
	Develop and submit a proposal to Russian Aviation authorities to minimize noise impacts on local communities through optimization of approach routes	6 months after signing LA
	Develop a proposal for phasing out aircraft with excessive noise upon negotiations with airlines	12 months after signing LA
	Prepare a detailed and phased project for upgrade to collection and treatment of runoff and waste water in conformance with the Master Plan and IFC requirements for waste water treatment	12 month after signing LA
	Develop a waste management plan for operations	12 months after signing LA
	Develop a spill prevention and liquidation plan	12 months after signing LA
	Implement upgrades to collection and water treatment systems according to the master plan	According to the schedule
	Ensure that all asbestos containing materials on site and in construction and demolition waste and are identified and handled in accordance with international best practices and IFC requirements	Throughout construction
	Conduct archaeological and unexploded ordinance survey of the airport site and develop chance find procedure for construction	Upon signing EPC contract

March 2, 2010

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Community Health, Safety and Security	Develop an emergency response plan for construction	Upon signing EPC contract
	Develop an emergency response plan for operation	36 months after signing LA
	Obtain life and fire safety approvals from the respective government agency for design of the terminal and develop a Fire Safety and Evacuation Plan	Before commissioning of the new terminal