

**ENVIRONMENTAL AND SOCIAL ACTION PLAN – Part 1**  
**Universal II #28604**  
**Universal Enterprises Private Limited (UEPL)**  
**March 17, 2010**

Item	Action	Completion Indicator	Timetable
<b>PS1: Social and Environmental Assessment and Management Systems</b>			
1.	UEPL to put in place a company-wide applicable, SEHS management system (SEMS) as described in the ESRS, which is certified to an internationally recognized standard acceptable to IFC, with IFC Performance Standards appropriately incorporated	UEPL has provided to IFC a copy of certification of its SEMS for conformance to an internationally recognized standard	Within 12 months of first disbursement
2.	UEPL will appoint a fulltime appropriately qualified senior executive at the corporate level for oversight of SEHS aspects to ensure consistent application of the SEMS across all of UEPL's resorts and operations	Copy of the appointment contract of the SEHS Manager (including the credentials) accepted by IFC	Prior to first disbursement.
<b>PS2: Labor and Working Conditions</b>			
1.	UEPL to upgrade their HR policies to make these consistent with IFC PS2 including: the disciplinary procedure; inclusion of specific timeframe for various steps in the grievance redress procedure; provision for protection of confidentiality and non retribution in the grievance redress procedure; and implementation of procedures to maintain full legal documentation for all employees who	Upgraded policies, procedures and practices accepted by IFC	Prior to first disbursement

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	are below 18 years of age		
	<b>PS3: Pollution Prevention and Abatement</b>		
1.	UEPL will at Kuramathi resort implement measures including: (a) ensuring that no plastic or hazardous material is incinerated; and (b) monitor incineration temperature.	(i) sub actions (a) and (b) completed	Prior to first disbursement
2.	UEPL will implement a program to: (a) label, segregate and store all hazardous wastes under secondary containment; and (b) maintain records of all hazardous waste generated and disposed. Management of scrap yard needs to be improved	Detailed note on facilities and procedures for hazardous waste and scrap management proposed to be provided by UEPL accepted by IFC  Full implementation of the measures detailed in the above note	Prior to first disbursement  Within 12 months of first disbursement
3.	UEPL will implement a program to: ensure that all resorts identify and phase out WHO Class I (highly hazardous) and II (moderately hazardous) pesticides, if they are used at any of the resorts; and introduce integrated pest management and integrated vector management.	Detailed note on the measures implemented accepted by IFC	Within 12 months of first disbursement