

ENVIRONMENTAL & SOCIAL ACTION PLAN FOR KALYANI GERDAU STEEL

November 2009

No.	Item	Deliverables	Timeframe	Responsible Person
1.	Develop a detailed environmental and social management plan based on the REIA and to ensure ongoing compliance with national and IFC requirements during construction and operation.	Environmental and Social Management Plan with specific, time-bound and measureable actions and well defined responsibilities	Condition of Disbursement	K.M. Bhat
2.	KGS in consultation with IFC shall finalize the protocol for monitoring its EHS performance during construction and operation phase for reporting to IFC through Annual Monitoring Reports (such as format, parameters, frequency of the EHS monitoring and reporting)	Updated monitoring programs for construction and operational phases. Monitoring records, reports	Condition of Disbursement	K.M. Bhat
3.	Simulate the projected NOx and CO levels with the help of internationally accepted models and using on the available ambient air quality data, to assess its compliance against the IFC's EHS guidelines.	Report of projected NOx and CO levels in the ambient air due to the proposed expansion project	Condition of Disbursement	A.K. Uppal
4.	Set up a community engagement information program and a formal mechanism for addressing community grievances related to project construction and operation.	Document describing community information program and grievance mechanism	Condition of Disbursement	S. Bhavi
5.	Share with IFC the new HR manual and other relevant information once it is finalized, to assess its compliance with PS2 requirements. Make necessary changes in the HR manual to address any gaps with the PS2 requirements, identified after the review by IFC.	Submit the HR manual and other relevant documentation	Condition of Disbursement	S. Bhavi
6.	Develop a documented procedure for screening and training of armed security guards in accordance with IFC PS4a	Procedure for screening and training of armed security guards	Condition of Disbursement	S. Bhavi
7.	IFC shall conduct the due-diligence of KGS's limestone and dolomite mines once the operations are resumed and develop an action plan as necessary to ensure the compliance with IFC PS and EHS guidelines.	Due-diligence of mining operation and action plan	Once the mines resume operations	K.M. Bhat