

**Elite, Environmental and Social Action Plan (ESAP)  
April 2010**

	<b>Environmental or Social Issue</b>	<b>Corrective Actions Required</b>	<b>Timetable Milestones/Events</b>
	<b>Management Systems</b>		
1	Environmental and Social Management Systems: Extend and Supplement Health & Safety Management System with Environmental procedures, objectives and targets into an integrated Social, Health, Safety and Environmental (SHSE) system to ensure compliance with relevant IFC's PS guidelines and host country regulations.	Set up and integrate key indicators into the Annual Monitoring Report. as following: L&FS, occupational health and safety, energy efficiency and water use.	Present HS objectives and targets to IFC in AMR (Annual Monitoring Report).
	<b>Life and Fire Safety System</b>		
2	Amend project design and construction process, such that the building incorporates all recommendations of the FPC Fire Life and Fire Safety Review Report.	<ul style="list-style-type: none"> <li>(i) written confirmation that the audit report recommendations will be incorporated into project design;</li> <li>(ii) time-bound LFS Action Plan is prepared showing implementation schedule for key LFS components such as sprinkler and alarm systems.</li> <li>(iii) Interim inspections to confirm that the LFS Action Plan is being implemented as agreed. Monitor and report the implementation of LFS Action Plan on quarterly basis.</li> </ul>	<p>Condition of first Disbursement</p> <p>Condition of first Disbursement</p> <p>October 2010 then quarterly Final review to be undertaken before public opening of the building.</p>
3	Anti seismic protection management system: Independent evaluation of seismic measures implemented shall be provided	(i) Written confirmation that the design and construction of the building meets Armenian anti seismic design codes. This will be provided through the inspection reports required by local authorities.	Before opening to the public.
	<b>Labor &amp; working conditions and project affected stakeholders</b>		
4	Management of labor and OHS (Occupational Health and Safety) conditions for contractors, including construction workers.  Continue the necessary OHS training and implementation of a formalized OHS Management System	According to the approved training plan's schedule	Internal reports on the progress of implementation and records of effectiveness of participants training sessions to be included in AMR.

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5	Current Social and HR policy to confirm fully to national labor law and IFC PS2 requirements.	Review and amend the Social and HR policy to confirm to national labor law and IFC PS2 requirements including a formalized employee grievance mechanism, non-discrimination, freedom of association, collective bargaining, child labor and forced labor.	Condition of Disbursement
6	A grievance mechanism for the construction workers, future tenants, and project affected (neighboring) communities shall ensure these groups have a well defined way of expressing grievances and have them handled fair and consistently.	The Elite Group and the Contractor's companies will maintain, or verify the existing of a transparent grievance mechanism for the construction workers and project affected (neighboring) communities. The similar system will be covered by the international commitments made by Elite for all its tenants.	The Company to confirm the availability of a grievance mechanism for the construction workers and project affected (neighboring) communities within three months of loan signing. Actual grievances and the way the grievances were handled are to be included in AMR.