

National Collateral Management Services Limited
Environmental and Social Action Plan
Date: May 26, 2010

#	Action	Indicator of task completion	Completion date
1.	NCMSL will develop and implement a set of standard operating procedures (SOPs), encompassing SEHS and fair trade aspects as described in the ESRS, to ensure that the Company's construction and operation outcomes are consistent with applicable Indian regulatory requirements, IFC Performance Standards and Good International Industry Practices (GIIP).	SOPs accepted by IFC and IFC review confirms satisfactory implementation of the SOPs	June 2011
2.	NCMSL will develop a set of detailed environmental, health and safety (EHS) requirements to be included in the construction contracts and against with EHS performance of the construction contractors will be monitored.	Detailed EHS requirements and contractual provisions accepted by IFC	December 2010
3.	NCMSL will implement a community engagement and grievance redress procedure in accordance with IFC Performance Standard provisions	Copy of grievance procedure accepted by IFC	October 2010
4.	NCMSL will develop and implement: a formal grievance redress procedure; further upgrade the disciplinary procedure ; and procedures to ensure and document contractor (security guards, loading/unloading contract labor) compliance with applicable labor laws .	Procedures accepted by IFC	October 2010
5.	NCMSL will as described in the ESRS: phase out DDVP; put in place procedures consistent with good international industry practice on fumigation and pest management operations; procedures for handling, storage, application and disposal of deltamethrin; and procedures for management of hazardous wastes in accordance with regulatory requirements.	Procedures accepted by IFC and IFC review confirms satisfactory implementation of the procedures	December 2010