

ENVIRONMENTAL AND SOCIAL ACTION PLAN
Groupe Soufflet (#30067)
November 24, 2010

Item	Action	Completion Indicator	Timetable
PS1: Social and Environmental Assessment and Management Systems			
1	Soufflet will implement an Environmental and Social Management System (ESMS) in the Agriculture Division covering all the basic elements of a management system: environmental and social assessment, management programs, organization capacity, training, community engagement, monitoring and reporting.	Provide to IFC satisfaction a copy of the ESMS implementation plan Consistent with IFC PS1 requirements as described in the Guidance Notes 1.	LS + 180 days
2	Soufflet will implement a job coaching program in the Eastern Europe countries, in which local EHS teams will be supervised by Senior specialists from Head Quarters to disseminate the existing expertise across the Company operations Soufflet will also implement an EHS training briefing for all contractors that will be working inside Soufflet Group Plants and covering Soufflet EHS policies and procedures.	Provide to IFC satisfaction a copy of the coaching program. Provide to IFC satisfaction a report of the training structure and a copy of the communication material.	LS + 180 days
PS2: Labor and Working Conditions			
3	The Agriculture Division will conduct a risk assessment of its silos and develop corrective action plan to implement more efficient dust control and suppression systems	Provide to IFC satisfaction a copy of the risk assessment consistent with WBG/IFC EHS General Guidelines requirements and the correspondent corrective action plans.	LS + 360 days

4	<p>Soufflet will narrow the frequency of the monitoring of workers' exposure to noise and respirable Particulate Matter to a bi-annual basis when the workplace levels exceed the TLVs – Threshold Level Values as defined in IFC EHS Guidelines.</p> <p>Soufflet will develop a job observation program with routinely site inspections to improve the enforcement of the use of the PPEs and implementation of Soufflet's policies and procedures</p>	<p>Provide to IFC satisfaction a copy of the monitoring reports</p> <p>Provide to IFC satisfaction a report of the program implementations with some indicators such as number of corrective actions taken, number of inspections, PPE use adherence</p>	Every year in the AMR
5	Soufflet will identify with warning signs all confined spaces and improve the risk communication in the plants consistent with IFC EHS guidelines Section 2.8	Provide to IFC satisfaction a report of the mentioned required actions implementation.	In the first AMR
PS3: Pollution Prevention and Abatement			
6	Soufflet will provide formal written decommissioning plans consistent with WBG/IFC EHS Guidelines, section 4, requirements or with an equivalent international standard.	Provide to IFC satisfaction a copy of the decommissioning plans	LS + 360 days
7	Soufflet Malting Division will deploy wastewater pre-treatment (adapted to each specific situation) at all plants that wastewater is delivered to the public sewage systems to achieve compliance with WBG/IFC General EHS Guidelines requirements as defined at table 1.3.1	-Provide to IFC satisfaction a gap analysis -In case any gap has been identified, provide for IFC Satisfaction a Corrective Action Plan with an implementation timetable	LS + 180 days
8	The Soufflet Malting division will monitor NOx emissions from the Boilers feed with natural gas and will deploy the necessary adjustments to achieve compliance with WBG/IFC General EHS Guidelines requirements as defined at table 1.1.2. The Company will also monitor emissions rates of Particulate Matter, SO2 and NOX from its Boiler in Kazakhstan and will deploy the necessary adjustments to achieve compliance with WBG/IFC General EHS Guidelines requirements as defined at table 1.1.2. The Company will also consider alternative options to replace oil consumption in Kazakhstan to natural gas or Biomass.	Provide to IFC satisfaction a copy of the monitoring reports and gap analysis -Provide for IFC Satisfaction a Corrective Action Plan with an implementation timetable	LS + 180 days LS + 360 days

9	<p>Where the Soufflet malting division uses Ammonia or HCFC R22, they will deploy the refrigerating facilities with alarm systems to identify leaks, and will also put proper warning signs in the area</p> <p>HCFC-R22 was banned by the Montreal protocol and the Soufflet Malting division will replace it to other types of refrigerating gas, preferably Glycol oil in accordance with the regulation delays.</p>	<p>Provide to IFC satisfaction a report of the mentioned required actions implementation.</p> <p>Provide for IFC Satisfaction a Corrective Action Plan with an implementation timetable</p>	<p>LS + 180 days</p> <p>LS + 180 days</p>
10	<p>The Soufflet Malting Division has two storage tanks for heavy oil in Kazakhstan and underground pipes coming from the oil unload facility. Soufflet will conduct a gap analysis and will deploy an action plan to achieve compliance with WBG/IFC General EHS Guidelines requirements as defined in section 1.5 and 3.3.</p>	<p>Provide for IFC Satisfaction a corrective action plan with an implementation timetable</p>	<p>LS + 360 days</p>
11	<p>Soufflet Agriculture Division will bring its pesticides warehouses to compliance with EU standards, Agriculture division will also develop a safety procedure for Pesticides transport, storage and distribution with provisions for risk communication (warning signs and Material Safety Data Sheet), use of Personal Protective Equipment – PPE, emergency equipments and procedures, training, product segregation and handling.</p> <p>Soufflet will develop and implement a pesticide selection procedure and will phase out any pesticide that follows under World Health Organization (WHO) Class Ia or Ib, over time.</p>	<p>-Provide for IFC Satisfaction a Corrective Action Plan with an implementation timetable</p> <p>-Provide to IFC satisfaction a copy of the procedure</p> <p>-Soufflet will provide for IFC Satisfaction a list of all pesticides in use that fall into WHO class 1a and 1b, the possible existing technical alternative solutions and an implementation plan to replace them.</p>	<p>LS + 180 days</p> <p>LS + 180 days</p> <p>LS + 360 days</p>

	PS4: Community Health, Safety and Security		
13	Soufflet will develop a corporate Security Personnel policy covering the assessment of risk, hiring, training, rules of conduct, equipment and monitoring as well as a grievance mechanisms for local communities to express concerns and in accordance with local laws to ensure the requirements of PS4 on Security Personnel are met throughout the Group	-Provide to IFC satisfaction a copy of the policy	LS + 360 days