

**Nigeria: Persianas Group (30933)**  
**Environmental and Social Action Plan**

#	Action	Deadline
<b>PS-1 Social and Environmental Assessment and Management System</b>		
1.	Persianas will develop generic terms of reference for environmental and social impact assessments (ESIAs) of potential mall or other greenfield property development projects that respond to the requirements of the Performance Standards.	June 2012
2.	Persianas shall develop and disseminate within the company an environmental and social policy statement.	June 2012
3.	Persianas shall appoint a Group level Environmental and Social Officer, reporting to the Chief Investment Officer.	June 2012
4.	Persianas shall undertake a generic assessment of environmental and safety risks in its construction projects, and prepare standard specifications and/or procedures to be included in future invitations to tender for construction works with the intention contractually to require contractors to manage these risks	September 2012
<b>PS-2 Labor and Working Conditions</b>		
5	Persianas Group shall develop a Human Resources Policy and standard human resources operating procedures that are reflective of Performance Standard 2. This shall include the requirement that construction contractors follow most of the PS2 requirements in their operations on Persianas' construction sites.	September 2012
<b>PS-3 Pollution Prevention and Abatement</b>		
6	Generator air emissions shall be monitored and reported on an annual basis to IFC in an Annual Monitoring Report. If emissions from any engine exceed WBG EHS General Guideline values corrective action will be taken and reported to IFC.	March 2013 and annually thereafter.
<b>PS -4 Community Health, Safety and Security</b>		
7	<ul style="list-style-type: none"> <li>i. Persianas shall provide formal statement from a qualified fire safety professional confirming that the fire safety aspects of the design and operation of the four malls currently operational or under construction meet the requirements of the life and fire safety section of the WBG EHS General Guidelines, i.e.: the malls meet all local fire safety requirements and the requirement of an internationally recognized fire safety code.</li> <li>ii. If such a statement cannot be made available for any of the properties, then an audit shall be undertaken by a fire safety professional which shall either confirm compliance as (i) above or list corrective actions to be taken to bring about compliance.</li> <li>iii. If corrective actions are required, a timescale for their implementation shall be agreed between IFC and Persianas.</li> <li>iv. The fire safety professional shall confirm, for those malls which were not fully constructed when the Item (i) opinions were provided, that the malls were constructed and are operated in accordance with design and thus in their as-constructed condition meet the requirements of the life and fire safety section of the WBG EHS General Guidelines.</li> </ul>	<ul style="list-style-type: none"> <li>i. June 2012</li> <li>ii. June 2012</li> <li>iii. June 2012</li> <li>iv. As indicated by construction timing.</li> </ul>
8	Persianas shall institute a program of quality testing for potable water available in the malls.	June 2012
<b>PS-5: Land Acquisition and Involuntary Resettlement</b>		
9	A Resettlement Action Plan (RAP) has been completed, disclosed and agreed with those persons who will be affected by the development of the Ibadan site. The RAP will define the numbers of people affected by the Ibadan project, their physical assets to be replaced and compensation sums agreed.	April 2012