

OCI GROUP #30974
Environmental and Social Action Plan (ESAP)
May 24, 2011

Item	Action	Deliverable	Due Date
Social and Environmental Assessment and Management System			
1	Incorporate the provisions of IFC's Performance Standards ¹ and applicable IFC EHS guidelines ² into OCI's current HSE management system and standard operating procedures.	Revised HSE management system approved by OCI Board	Within 3 months of first disbursement
2	Revise the corporate HSE management system for construction activities to include procedures that will ensure that potential environmental and social risks and impacts have been adequately screened and identified in accordance with the requirements of IFC Performance Standard 1.	Standard procedure approved by OCI Board and incorporated into all tender and project development reviews	Within 3 months of first disbursement
3	Designate an E&S advisor at the corporate level to oversee E&S risk and impact screening and assessment of OCI's existing and new business and ensure the implementation of OCI's E&S management program and stakeholder engagement policies.	Revised organogram with position and reporting lines, CV of proposed candidate, and confirmed start date	Within 3 months of first disbursement
4	Incorporate the provisions of IFC's Performance Standards and applicable IFC EHS guidelines ³ into OCI's current HSE management system and standard operating procedures at each fertilizer production plant	Revision of Management Systems at EFC and EBIC and adoption of the PS and guidelines into Sorfert once operational	Within 3 months of first disbursement for EFC and EBIC

¹ IFC Performance Standards on Social and Environmental Sustainability , April 30, 2006

² Applicable IFC Environmental, Health and Safety Guidelines:

(i) IFC EHS General Guidelines, April 30, 2007

³ Applicable IFC Environmental, Health and Safety Guidelines:

(ii) IFC EHS General Guidelines, April 30, 2007

(iii) IFC EHS Guidelines for Nitrogenous Fertilizer Production, April 30, 2007

Item	Action	Deliverable	Due Date
5	Establish an organization structure that ensures that the HSE performance at OCI's fertilizer assets can be monitored and demonstrated at the corporate level.	Revised corporate HSE organizational structure	Within 3 months of first disbursement
Pollution Prevention and Abatement			
6	<ul style="list-style-type: none"> i. Benchmark current GHG emissions from fertilizer plants ii. Monitor GHG emissions annually and report to IFC 	Measurement of total GHG emissions across OCI fertilizer plants	<ul style="list-style-type: none"> i. Prior to first disbursement ii. As part of AMR
7	<ul style="list-style-type: none"> i. Benchmark current water consumption at fertilizer plants ii. Monitor water consumption annually and report to IFC 	Measurement of total water consumption across OCI fertilizer plants	<ul style="list-style-type: none"> i. Prior to first disbursement ii. As part of AMR
Community Health, Safety and Security			
8	Adapt emergency response plans for all construction sites to ensure compliance with community notification requirements and other provisions of PS4.	Revised standard operating procedures	Within 3 months of first disbursement
9	Adapt security forces arrangements for all construction sites and assets to ensure compliance with provisions of PS4.	Revised standard operating procedures	Within 3 months of first disbursement
10	Adapt emergency response plans for each fertilizer plants to ensure compliance with community notification requirements and other provisions of PS4.	Revised standard operating procedures	Within 3 months of first disbursement
11	Establish a community grievance mechanism to receive and address community complaints to use where project related disturbance and impacts to local communities have been anticipated.	Revised standard operating procedures	Within 3 months of first disbursement