

Georgia/TBILVINO #30992
Environmental and Social Action Plan (ESAP)

Task	Indicator of Completion	Required Completion Date
PS1. Social and Environmental Assessment and Management Systems		
1. EHS Capacity and Management Systems - Nominate or appoint an Environment, Health and Safety (EHS) Coordinator and ensure he/she has adequate expertise/training to oversee the implementation of this ESAP (hire a consultant if required) - Incorporate EHS elements into the integrated management system based upon the “plan, do, check act” philosophy and principles contained in ISO 14001 and OHSAS 18001. - Prepare a state EHS assessment report for the new project in Khakheti outlining key EHS risks, mitigation actions and responsibility for implementation - Obtain state environmental license for the new facility in Khakheti	- Submit Job description and CV of appointed person to IFC - Operational management system - Submit Assessment report to IFC - Submit environmental license to IFC	BEFORE 1st DISBURSEMENT COMMITMENT +12 MONTHS BEFORE CONSTRUCTION COMMENCES
PS2: Labor and Working Conditions		
2. Review and update the Human Resources Policy Tbilvino will review and update its Human Resources policy to include all of the key requirements of IFC Performance Standard 2 on labor and working conditions (e.g. Non-discrimination, freedom of association and collective bargaining, child labor and forced labor).	Present to IFC a copy of the updated Human Resources policy	COMMITMENT + 3 MONTHS
3. Workers’ Representatives and Grievance Mechanism - Ensure workers’ representatives are elected by the workers through a voting system (in the absence of a Union) - Install suggestion/complaints boxes at facilities, systematically review and record the actions	Submit number and name of the workers to IFC	COMMITMENT +6 MONTHS
4. Occupational Health and Safety - Monitor incidents and accidents in written form, according to guidance provided in the AMR format - Train 10% of employees on First Aid on a rolling basis - Train employees and contractors on sector specific health and safety hazards - Provide MSDSs of pesticides in local language on supplier farms - Develop documented permission system for “hot work”, “work at height “, “electrical works” and “confined spaces” for incorporation into the Integrated Management System	Submit forms, records, to IFC in AMR	COMMITMENT +12 MONTHS
5. Social facilities: Improve the capacity and hygienic conditions of the kitchen and social areas at the Tbilisi facility to meet current demand and prioritize design of these areas in the newly constructed facility in Khaketi.	Submit relevant photos for both facilities to IFC	COMMITMENT +9 MONTHS
6. Fire equipment: Install fire detection and alarm system at the Tbilisi facility.	Provide IFC a copy of detectors	COMMITMENT + 18

Task	Indicator of Completion	Required Completion Date
	plan	MONTHS
7. Supply Chain: - The Company will update its approved list of suppliers to account for EHS concerns eg. safe use and storage of fungicides, pesticides, possible use of harmful child labor, use of safe hand tools and machinery - The Company will rise awareness among farmers for safe fungicide use and other safe agricultural practices and harmful child labor	- Submit records to IFC - Prepare bulletin for safe agricultural practices and distribute to farmers	COMMITMENT +6MONTHS COMMITMENT +9 MONTHS
PS3: Pollution Prevention and Abatement		
8. Wastewater: - The company will conduct monthly analyses (at least pH, COD, BOD5, TKN and P) of effluents of Tbilisi plant operations, including sanitary effluent discharge. If measurements exceed IFC limits, Tbilvino will propose corrective measures, and will agree with IFC a schedule to bring into compliance with IFC guideline requirements. - The company will provide for sufficient level of effluent treatment to ensure that effluent characteristics for its Khakheti operations will be in line with relevant IFC Guidelines.	- Submit results of measurements to IFC - Submit preliminary treatment design documents to IFC - Submit design and contract documents of treatment process - Submit construction photos of treatment process	COMMITMENT +6 MONTHS BEFORE 1 st DISBURSEMENT CONDITION of 2nd DISBURSEMENT COMMITMENT +24 MONTHS
9. Air Emissions: The company will provide measurements of NO_x and Dry gas excess O₂ content for the two natural gas burned boilers	Submit measurements in AMR	COMMITMENT +12 MONTHS