

International House: Environmental and Social Action Plan (ESAP): August 2011

PS	Action	Completion Indicator	Timetable
2	Include the requirement for compliance with Performance Standard 2: Labor and Working Conditions and national legislation in the contract between Progimmo and the building contractor.	Submission of contract to IFC confirming the requirements are included in the contract.	Prior to first disbursement.
2	Submit the building contractor's human resources documentation to IFC to confirm compliance with PS: Labor and Working Conditions, and national legislation.	Submission of contractor's human resources documentation confirming compliance with PS 2: Labor and Working Conditions, and national legislation.	Prior to first disbursement.
2	Six months following the start of construction, commission an independent party acceptable to IFC to audit implementation of the contractor's human resources documentation. Where gaps are identified, a time-based corrective action plan is to be defined.	Submission of audit report and corrective action plan if required to IFC.	Seven months following commencement of construction. Positive covenant.
2	Compile a guideline document defining the requirements of Performance Standard 2: Labor and Working Conditions ("PS 2") as applicable to the management of human resources. These guidelines are to be implemented by all companies providing ongoing, regular (e.g., cleaning) services to Progimmo.	Submission of approved guideline document to IFC.	Six months prior to completion of construction. Positive covenant.
2	Include the requirement for implementation of the requirements for compliance with PS 2 as defined in the guideline document referred to above in contracts with relevant service providers.	Submission of contract documentation to IFC for confirmation.	Prior to signing of contract with service providers. Positive covenant.
2	Compile an occupational health and safety ("OHS") plan for the construction phase that is compliant with Performance Standard 2: Labor and Working Conditions. The plan is to include: The national OHS labor legislation requirements and the mechanisms to	Submission of approved OHS plan.	Condition of first disbursement.

	be implemented to ensure compliance thereto; • The requirement for a full-time safety representative; • A training procedure defining when training is to occur and the topics to be covered; • High risk activities and how these are to be managed; • Personnel Protective Equipment requirements and how the application thereof will be enforced; and • A schedule for reporting on compliance with the OHS plan to Progimmo.		
2	Include the requirement for compliance with national labor legislation in all tenancy agreements.	Submission of tenancy agreement confirming inclusion of requisite clause.	Prior to signing the first tenancy agreement.
3	Compile an environmental management plan ("EMP") for the construction phase that defines as a minimum: • The stormwater management plan; • Waste management practices; • The manner in which hazardous materials will be stored; • Times when construction will occur; and • A complaints procedure.	Submission of approved EMP.	Condition of first disbursement.
3	Install a waste water treatment plant which: • Has the capacity to accommodate the volume of waste water as generated by the complex once fully occupied; and • Complies with national standards and the World Bank ("WBG") Environmental, Health and Safety ("EHS") Guidelines.	• Installed waste water treatment plant. • Water quality monitoring results confirming compliance with the WBG EHS Guidelines to be submitted via the annual monitoring report.	Six months prior to project completion, provide IFC with a signed contract with the service provider confirming procurement details, the time table for plant installation and confirmation that the plant will comply with the requirements as defined in the WBG EHS Guidelines. Installed waste water treatment plant prior to occupancy by tenants.
3	Install an oil water separator on all stormwater outlets points from the site.	Submission of photographic evidence confirming installation of separators prior to the complex being operational.	Prior to tenants taking occupancy. Positive covenant.

3	Install the above ground fuel storage tank in a bunded area sufficient for 110% of the tank's capacity.	Submission of photographic evidence confirming bunding.	Prior to completion of construction. Positive covenant.
3	Compile a pest management plan consistent with the requirements of the WBG EHS Guidelines.	Submission of approved pest management plan to IFC.	Prior to occupancy of the complex by tenants.
4	Verification by a qualified specialist acceptable to IFC that the wind force and earthquake analyses are acceptable and have been adequately incorporated into the complex's design.	Submission of confirmation to IFC that the analyses have been undertaken against a recognized standard for such and the findings adequately incorporated into the complex design.	Condition of first disbursement.
4	Engage a life and fire safety ("LFS") engineer acceptable to IFC to design/review the LFS Master Plan (engineering design) for the complex. The LFS design shall be responsive to one internationally recognized LFS code and the national LFS code. The design shall also comply with the LFS requirements of the WBG's EHS General Guidelines.	Submission of signed contract in accordance with agreed Terms of Reference for professional services to complete the LFS system design / review.	Condition of first disbursement.
4	Conduct a post-construction inspection by a LFS engineer acceptable to IFC to verify that the LFS system was built/installed as designed. If not built/installed as designed, develop an upgrade list/action plan to ensure the system will meet appropriate requirements. Conduct post-upgrade list/action plan audit to verify that the LFS system was built/installed as designed.	Submission of signed contract in accordance with agreed Terms of Reference for post construction audit and submission of post construction inspection and certification of as-built LFS system.	Inspection indicating acceptance of LFS system as built submitted prior to occupancy of the complex by tenants. Positive covenant.