

TRANS OIL MOLDOVA (#31432) ENVIRONMENTAL AND SOCIAL ACTION PLAN – APRIL 2012

Unless a specific plant name is not mentioned, all plants are responsible for the action item

Item	Action	Completion Indicator	Timetable
PS1: Assessment and Management of Environmental and Social Risks and Impact			Date
1.	Obtain written confirmation from the State Ecological Inspectorate as to the requirement for a project EIA and obtain written certification in relation to an Ecological Permit for Operation.	(i) Submit written confirmation and written certification	December 2012
2.	Implement a formal Environmental, Occupational Health and Safety and Food Safety Management System consistent with IFC Performance Standard PS 1, and in line with ISO 22000, ISO 14001 and OHSAS 18001 requirements and integrate to the Quality Management system at all Group facilities	(i) Submit adequate evidence to IFC that EHS and food safety management system implementation is completed. (ii) Provide adequate evidence to IFC that all corrective actions are completed and management system is capable of certification.	June 2014 June 2015
3.	Hire a Group level/ corporate Environment and Occupational Health, Safety Manager/Coordinator to coordinate with plant-level EHS officers and consolidate the implementation of the systems , effective share of lessons learnt among facilities, to coordinate and follow up implementation of this action plan	(i) Submit CV and contract of the Group's EHS manager to IFC.	December 2012
4.	Extend monitoring program to cover wastewater quantity and quality, air emissions, energy and water consumption per ton production, and lost time accidents Report EHS key performance indicators of the corporate EHS management system internally and to the national regulatory agencies requiring EHS monitoring externally.	(i) Submit monitoring results in AMR (ii) Submit reporting evidences in AMR	AMR Submission, 2013
PS2: Labour and Working Conditions			
5.	-Prepare corporate level and facility level HR Policy in line with PS2 to include sections on non-discrimination, workers' right to form/join professional trade unions, grievance mechanism and the right for collective bargaining and conditions of	(i) Submit evidences to IFC	June 2013

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	retrenchment; Make available/visible to all employees. -Develop a separate contractors' management policy and templates of agreements with contractors, which should include provisions on OH&S issues and rights of contractors' workers. -Introduce election for worker representatives among workers as an alternative mean to workers' organizations for its employees to express their concerns and grievances regarding working conditions and terms of employment -Place suggestion boxes to improve worker's grievance mechanism		
6.	Improvement of OHS practices at Trans Oil Facilities: -Prepare and implement a confined space permit system which includes gas measurements at all facilities -install/implement physical lock out tag out system at all facilities where required and applicable -provide use of only non-sparking hand tools at Trans Cargo Terminal and other elevators - improve lighting at the stairs of Kelley elevators and evacuation plans should be posted in factory area as well as office areas. - perform risk assessments for all other elevators - complete actions resulted from risk assessment for other elevators - report occupational accidents	(i) Submit work permit forms of confined spaces permits to IFC (ii) Submit evidences to IFC (iii) Submit evidences to IFC (iv) Submit evidences to IFC (v) Submit risk assessments to IFC (vi) Submit evidences to IFC (vii) Submit records in AMR	December 2013 December 2014 June 2013 June 2013 June 2013 June 2014 AMR Submission

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	Construction safety - Introduce and implement construction safety policies and procedures, ensure OHS trainings of contractors and make inspections for contractor safety including PPE (Personal protective equipment) and safe equipment use, put provisions on OHS and environment in new contracts	(viii) Provide evidence to IFC	December 2012 ongoing
7.	Perform third party OHS audits for FS and Aur Alb/ Refinery facilities	(i) Submit audit contract to IFC (ii) Submit audit results to IFC (iii) Complete actions and submit evidences report to IFC	December 2012 June 2013 December 2013
8.	Supply chain -Establish supply chain management system procedures to ensure compliance of suppliers with IFC PS1, PS2 and PS6 -Implement Global GAP program for all farmers in a planned schedule, -Prepare detailed list of pesticides used, the quantities and application methods and implement a pesticide management plan.	(i) Submit procedures to IFC (ii) Submit schedule to IFC (iii) Submit list and plan to IFC	June 2013 AMR Submission, June 2013 AMR Submission, June 2013

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PS3: Resource Efficiency and Pollution Prevention			
9.	Monitor energy and water consumption quantities and assess whether the consumption figures are within industry benchmark limits Perform Cleaner production/ resource efficiency audit if the consumptions are higher than industry benchmark figures Complete the action plan of the CP audit	(i) Submit results to IFC (ii) Submit results to IFC (iii) Submit evidences to IFC	June 2013 and onward AMR submission December 2013 December 2014
10.	Annually measure air emission parameters (NOx, SOx, PM , volatile organic compounds (VOCs), and greenhouse gases - namely CO and CO2) for Trans Oil and FS refineries	(i) Submit results to IFC	June 2013 and onward AMR submission
11.	-Monthly measure waste water pollution parameters (BOD, COD, O&G, SS and pH) for Trans Oil and FS refineries - Improve treatment systems to be in line with WBG effluents parameters	(i) Submit results to IFC (ii) Submit evidences to IFC	June 2013 and onward AMR submission June 2015
12.	Prepare the records of hazardous materials used and stored at its facilities, and also records of sanitary standards regarding the storage of those hazardous materials	(i) Submit results to IFC	June 2013 and onward AMR submission
PS4: Community Health , Safety Security			
13.	-Assign specific point of contact for community relations, such as a Community liaison officer (CLO).	(i) Submit job description of CLO to IFC	December 2012

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14.	Perform risk assessment for emergency situations related to surrounding community by consultation with community representatives and integrate preventive actions in to emergency plan for Aur Alb facility	(ii) Submit emergency preparedness plan to IFC	AMR Submission, 2013
15.	Traffic safety Train all drivers on H&S, checks drivers' health conditions, maintains trucks, follow speed limits	(i) Drivers' training logs are maintained. (ii) Drivers' medical records are maintained. (iii) Trucks' technical maintenance records are maintained	June 2013, and onward AMR Submission