

ENVIRONMENTAL AND SOCIAL ACTION PLAN

PROJECT: NAMEL # 39113

| S. No. | ESAP Item | Deliverable | Expected timeline |
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| 1 | <p>Borrower shall secure the following legal consents and authorizations:</p> <ul style="list-style-type: none"> • Consent to Operate under Air Act (1981) for the installed DG sets; • Renew validity of consent to operate (CTO) for operation of hot mix plant, batching plant wet mix plant and stone crusher; • Ground water abstraction withdrawal permit; and • As per the consent to operate condition, submit annual environmental statement to state Pollution Control Board | Copies of all applications for pending consents and permits | Within one month of Deemed Date of Allotment |
| 2 | Upgrade the existing EIA to assess E&S impacts of the O&M phase and construction of the remaining road to meet PSs and implement additional PS compliant mitigation measures. | EIA report | Within 3 months of Deemed Date of Allotment |
| 3 | Undertake a retrospective social impact assessment covering all project affected families including non-titleholders. | SIA report | Within 8 months of Deemed Date of Allotment |
| 4 | Develop operational phase and remaining construction phase (in case of balance construction) E&S Management System (ESMS) consistent with ESIA recommendations and IFC requirements, including: Dust Management Plan; Traffic Safety Management Plan; Carriageway Waste Management Plan (Hazardous and non-Hazardous Waste); Oil and Chemical Spill Contingency Management Plan; Emergency Response Plan (including Community Emergency Response Plan); Occupational Health and Safety Management Plan; Workers' Accommodation Management Plan; Security Plan; and Contractor Management Plan. | Copies of all plans | Within 6 months of Deemed Date of Allotment Implementation Schedule as per the timeline suggested in the Plan |
| 5 | The Borrower must ensure that the EPC contract for the remaining construction and all contracts for operation & maintenance include the requirements for compliance with EHS aspects as covered by the plans mentioned in ESAP item #4. | Relevant sections of the EPC contract | Within 9 months of Deemed Date of Allotment |

| | | Copies of Amended Contracts | |
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| 6 | Develop a detailed, project specific monitoring and reporting program with monitoring measures applicable to each of the relevant management plans developed under ESAP item #4 and including labor practices of contractors and sub-contractors (e.g. non-use of child/forced labor, payment of minimum wages & overtime wages). | Monitoring & reporting plan Findings of monitoring to be included in the Annual Monitoring Report (AMR) | Within 6 months of Deemed Date of Allotment and ongoing |
| 7 | Borrower will upgrade its HR policies and procedures to meet PS2 requirement, particularly it will include: policy commitment to equal opportunity, workforce protection and non- discrimination; implementation of an employee grievance redress mechanism covering contract workers; contractor management & compliance; improving worker accommodation; and enhanced occupational health. | Upgraded HR policies and procedures | Within 3 months of Deemed Date of Allotment |
| 8 | Prior to the start of Livelihood Enhancement Program (LEP) implementation, appoint a full time social development specialist who will be responsible for LEP implementation. For EHS, the Borrower will appoint an EHS manager at the regional level also responsible for management EHS at Borrower. | Candidates acceptable to IFC and copy of appointment letters (not necessarily on Borrower's rolls) | Prior to LEP implementation Within 3 months of Deemed Date of Allotment |
| 9 | Develop and implement a detailed Livelihood Enhancement Program (LEP) as part of the SIA in compliance with IFC PS5 to address the gaps in compensation and to provide livelihood assistance benefits for all project affected families including non-titleholders | LEP report Completion report | LEP report within 8 months of Deemed Date of Allotment Complete LEP implementation in 36 |

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| | | | months of Deemed Date of Allotment |
| 10 | LEP completion audit to confirm compliance and to identify any remaining gaps and corresponding corrective actions. Complete implementation of mitigation measures based on the audit findings. | LEP completion audit report Gap closure report of corrective actions | Within 18 months of completion of LEP implementation Gap closure report as per the timeline proposed in the LEP completion audit |
| 11 | Undertake third-party monitoring of LEP implementation throughout the implementation period. | Quarterly LEP monitoring reports | Within 2 months from every quarter after start of LEP implementation. |
| 12 | Develop a detailed stakeholder analysis and engagement plan along with information disclosure plan and community grievance mechanism. | SEP and community grievance mechanism | Within 6 months of Deemed Date of Allotment Implementation as per the timelines suggested in SEP |
| 13 | Carry out a road safety audit and implement remedial measures, including procedures and measures to minimize community health and safety risks, recommended by it. | Road safety audit report and action taken report | Within 6 months of Deemed Date of Allotment |
| 14 | Undertake third party EHSS audit in the first year on bi-annual basis and on annual basis from second year onwards to assess satisfactory compliance to statutory, performance standards and ESMS requirements | EHSS audit reports | Appointment of EHSS audit consultant within 6 months of Deemed Date of Allotment. Audit to be conducted after 6 months and first report to be |

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| | | | submitted 2 months after first audit |
| 15 | Complete implementation of corrective action plan included in the ESDD report dated May 2017 | Action taken report | As per the timelines suggested in ESDD report (beginning from date of Deemed Date of Allotment); unless covered elsewhere as a part of ESAP |